

FILED
U. S. DISTRICT COURT
Eastern District of Texas
SEP 29 2003
CLERK

SEP 29 2003
DAVID MALAND, CLERK
PATRICK PARK

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

FILED-CLERK
U.S. DISTRICT COURT

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BY John

By PATRICK PARKER and DENA PARKER,
Deputy

Plaintiffs

vs.

FORD MOTOR COMPANY, INC.

Defendant.

CIVIL ACTION NO. 2-02CV-182
JUDGE FOLSOM
JURY TRIAL

JOINT FINAL PRE-TRIAL ORDER

This cause came before the court at a scheduling conference, pursuant to this court's local rules, we herewith file this Joint Pre-Trial Order, prior to the final Pre-Trial Conference scheduled for October 6, 2003.

A. COUNSEL FOR THE PARTIES

Plaintiffs:

Frank L. Branson
J. Gregory Marks
The Law Office of Frank L. Branson, P.C.
Highland Park Place
4514 Colc Avenue, 18th Floor
Dallas, Texas 75205
Telephone: (214) 522-0200
Facsimile: (214) 521-5485

82

Defendant Ford Motor Company:

Rickey L. Faulkner
Michael Eady
BROWN MCCARROLL, L.L.P.
1127 Judson Road, Suite 220
Longview, Texas 75601
Telephone: (903) 236-9800
Facsimile: (903) 236-8787

Douglas W. Seitz (Attorney in Charge)
Bryan Benevento
SNELL & WILMER
One Arizona Center
Phoenix, Arizona 85004-0001
(602)382-6000 Telephone
(602)382-6070 Facsimile

B. JURISDICTION

This Court has diversity jurisdiction of this action under 28 U.S.C. § 1332.

C. NATURE OF ACTION

This product liability action arises from a single-vehicle crash that occurred before dawn on August 29, 2001. Plaintiff Patrick Parker was driving a 2001 Ford F250 "Super Duty" super cab pick-up truck that was owned by Texas Utility Systems ("TXU") and outfitted as a work truck with gas sniffer devices, a generator, and large tool boxes. Mr. Parker was driving down US 287 near Quanah, Texas, when he saw deer in the highway. He swerved to miss the first one, but struck the second one. His vehicle went off the right side of the paved road, onto the dirt shoulder, and then rolled at least two and a half times. The vehicle came to rest upside down, on its roof. Mr. Parker suffered paralyzing injuries in the accident.

D. CONTENTIONS OF THE PARTIES

(1) Plaintiffs' Contentions:

Plaintiffs contend that Ford knew that the 2001 Ford F250 pickup truck was more prone to rollover accidents than passenger cars and that head, neck and spine injuries were common injuries suffered by occupants exposed to a rollover event. Ford also knew that an effective rollover protection system – a system that included a strong roof and a restraint system that limited vertical movement – would substantially reduce head and roof contact in a rollover accident, thereby preventing head neck and spine injuries. Nevertheless, despite this knowledge, Ford designed, manufactured and marketed the F250 pickup truck with a defective rollover protection system – a system with a weak roof and a poorly designed restraint system. In fact, Ford failed to test the rollover protection system in the F250 to determine if it was effective in a rollover accident. As a result, Patrick Parker is now a C-7 quadriplegic from his head contacting the roof of his F250 pickup during the rollover. Patrick and Dena Parker have suffered substantial damages.

(2) Ford Motor Company's Contentions:

Ford Motor Company denies that the 2001 Ford F250 was defective or unreasonably dangerous and denies that it engaged in any conduct that warrants the imposition of damages.

Ford contends that, although the Federal Motor Vehicle Safety Standard for roof strength does not apply to the 2001 F250, Ford designed the roof of the F250 to comply with that standard, and the roof of the 2001 Ford F250 pickup involved in this case exceeds the strength requirement of that standard and is comparable in strength to other similar vehicles. Mr. Parker received a diving-type injury, and scientific studies have demonstrated that making the roof stronger will not prevent such injuries. Ford contends that much of the roof deformation shown

in the photographs taken after the crash was caused as the vehicle was rolled back onto its wheels after the doors had been removed. Ford contends that the restraints in the 2001 Ford F250 comply with all of the applicable Federal Motor Vehicle Safety Standards governing restraint systems and are similar to restraints in many other vehicles. There was no alternative practical and feasible restraint system which would have prevented Mr. Parker's injury.

E. STIPULATIONS AND UNCONTESTED FACTS

- (1) Patrick Parker was the driver of a 2001 Ford F250, VIN 1FTNX20L41EB99971 ("the vehicle"), involved in a single vehicle rollover accident which occurred while traveling eastbound on Highway 287 approximately 11.3 miles west of Quanah, Hardeman County, Texas. (hereinafter "the accident").
- (2) The accident occurred on August 29, 2001 at approximately 5:34 a.m.
- (3) The weather at the time of the accident was clear.
- (4) Texas Highway 287 is a divided four lane highway.
- (5) The road surface of Texas Highway 287 was dry blacktop.
- (6) The accident was investigated by the Texas Department of Public Safety, Texas Highway Patrol, Trooper Russell Conkling.
- (7) This 2001 Ford F250 was designed, manufactured and sold by Ford Motor Company.
- (8) The vehicle was placed into the stream of commerce in January 2001.
- (9) Texas Utility Systems ("TXU") was the owner of the vehicle.
- (10) This civil lawsuit was filed on August 14, 2002 by Patrick Parker and Dena Parker (hereinafter "the lawsuit").
- (11) Dena Parker is the wife of Patrick Parker.
- (12) Dena Parker was not involved in the accident.
- (13) Patrick and Dena Parker are residents of Childress, Childress County, Texas.
- (14) During the accident, Patrick Parker suffered a spinal cord injury resulting in paralysis.
- (15) Patrick Parker was 37 years old at the time of the accident.
- (16) Patrick Parker incurred \$186,137.51 in reasonable and necessary medical expenses to date as a result of his injuries suffered on August 29, 2001.

F. CONTESTED ISSUES OF FACT AND LAW

- (1) The extent of the roof deformation which occurred in the crash and when during the crash that deformation occurred.

- (2) Whether Patrick Parker's actions while driving his vehicle constituted negligence, and if so, whether such negligence was a proximate cause of his injuries.
- (3) Whether the roof and/or restraints of the 2001 F250 pickup was defective in its design and unreasonably dangerous.
- (4) Whether any defective and unreasonably dangerous condition in the design of the roof and/or restraints was a producing cause of the injuries suffered by Patrick Parker.
- (5) Whether during the accident sequence the roof collapsed and crushed Patrick Parker, or whether Patrick Parker essentially dove into the roof while the vehicle was upside down.
- (6) Whether there was a safer alternative roof design as the term "safer alternative design" is defined in TEX. CIV. PRAC. & REM. CODE § 82.005.
- (7) Whether plaintiffs' strict liability and negligence claims are improperly redundant (Ford brief).
- (8) Whether Patrick and Dana Parker are entitled to damages, and if so, what sum of money would fairly and reasonably compensate them for their respective damages as set forth in their complaint.
- (9) Whether Ford Motor Company negligently tested the roof and/or restraints of the 2001 F250 and whether such negligence, if any, was a proximate cause of the injuries to Patrick Parker.
- (10) Whether the jury should be instructed on the necessity of proof of "safer alternative design" in all design defect questions submitted to the jury, particularly plaintiff's negligence claim.
- (11) Whether Ford's actions in designing the roof and or restraint system of the 2001 F250 were malicious towards Patrick Parker.
- (12) Whether TEX. CIV. PRAC. & REM. CODE ch. 41 is unconstitutionally vague as applied to this case because it does not provide Ford with advance notice of the conduct that will subject it to punishment.
- (13) Whether TEX. CIV. PRAC. & REM. CODE ch. 41 is unconstitutionally vague as applied to this case because it permits arbitrary and discriminatory enforcement by plaintiffs' lawyers and juries.
- (14) Whether an award of punitive damages would under the circumstances be unconstitutional as applied because the lack of fair notice of the appropriate standard governing maliciously designed products.

- (15) The admissibility of evidence of other accidents (Ford brief).
- (16) The admissibility of post-sale evidence (Ford brief).
- (17) The admissibility of evidence of net worth (Ford brief).
- (18) Whether Michelle Vogler's expert opinions in this case are reliable and admissible. FED. R. EVID. 702.
- (19) Whether Keith Friedman's expert opinions on occupant restraint systems are reliable and admissible. FED. R. EVID. 702.
- (20) Whether Kenneth McCain's expert opinions respecting Patrick Parker's lost earning capacity are reliable and admissible. FED. R. EVID. 702.
- (21) Whether William Muzzy's opinions on seat belt designs are reliable and admissible. FED. R. EVID. 702.
- (22) Evidentiary issues raised in the parties' respective motions in limine.

G. LIST OF WITNESSES

- (1) Plaintiffs
See lists attached as Exhibit A.
- (2) Defendant
See lists attached as Exhibit B.

H. LIST OF EXHIBITS

- (1) Plaintiffs
See lists attached as Exhibit C.
- (2) Defendant
See lists attached as Exhibit D.

I. LIST OF ANY PENDING MOTIONS

(1) Plaintiffs

- (a) Plaintiffs' Motion in Limine
- (b) Plaintiffs' Motion to Exclude Michelle Vogler
- (c) Plaintiffs' Motion to Compel and for Sanctions.

(2) Defendant

- (a) Ford Motor Company's Motion to Exclude, or Alternatively, Motion in Limine (and supporting briefs);
- (b) Ford Motor Company's Motion to Exclude Expert Testimony of Dr. Kenneth McCain;
- (c) Ford Motor Company's Motion to Exclude Expert Testimony of Keith Friedman;
- (d) Ford Motor Company's Motion to Exclude Expert Testimony of William Muzzy;
- (e) Ford's Motion for Partial Summary Judgment Regarding Plaintiffs' Passenger-Restraint, Design-Defect Claims;
- (f) Ford's Motion for Partial Summary Judgment Regarding Plaintiffs' Failure-To-Warn Claims;
- (g) Ford's Motion for Partial Summary Judgment Regarding Plaintiffs' Punitive-Damage Claims;
- (h) Ford's Motion for Partial Summary Judgment Regarding Plaintiffs' Claims of Defective Vehicle Roof Design.
- (i) Ford's Objection and Motion to Strike Plaintiffs' Pretrial Disclosures.

J. PROBABLE LENGTH OF TRIAL:

The probable length of trial is two (2) weeks.

K. MANAGEMENT CONFERENCE LIMITATIONS

None

L. CERTIFICATIONS

The undersigned counsel for each of the parties in this action do hereby certify and acknowledge the following:

- (1) Full and complete disclosure has been made in accordance with the Federal Rules of Civil Procedure and the Court's orders;
- (2) Discovery limitations set forth in the Federal Rules of Civil Procedure, the Local Rules, and the Court's orders have been complied with and not altered by agreement or otherwise;
- (3) Each exhibit in the List of Exhibits herein:
 - (a) is in existence;
 - (b) is numbered; and
 - (c) has been disclosed and shown to opposing counsel.

APPROVED AS TO FORM AND SUBSTANCE:


Frank L. Branson
J. Gregory Marks
The Law Office of Frank L. Branson, P.C.
Highland Park Place
4514 Cole Avenue, 18th Floor
Dallas, Texas 75205
Telephone: (214) 522-0200
Facsimile: (214) 521-5485


BY: 
ATTORNEYS FOR PLAINTIFFS

APPROVED AS TO FORM AND SUBSTANCE:

Rickey L. Faulkner
Michael Eady
BROWN MCCARROLL, L.L.P.
1127 Judson Road, Suite 220
Longview, Texas 75601
Telephone: (903) 236-9800
Facsimile: (903) 236-8787

Douglas W. Seitz (Attorney in Charge)
Texas Bar No.: 00789975
SNELL & WILMER
One Arizona Center
Phoenix, Arizona 85004-0001
(602)382-6000 Telephone
(602)382-6070 Facsimile

BY: 
ATTORNEYS FOR DEFENDANT
FORD MOTOR COMPANY


USDS
Oct. 2, 2003

6. Al Darold Depo
(Deposition taken in Parker vs. Ford 09/10/03 and in Whitney vs. Ford; Flores vs. Kelly
Springfield Tire (03/06/03); Keeley vs. Ford (03/07/03); LaJeunesse vs. Ford (09/26/01);
Griego vs. Ford (10/16/01); Johnson vs. Ford (11/07/01) and Sturns vs. Ford (11/28/00).
7. Clarke Cunningham Depo
Deposition taken 05/09/01 in Spurgeon vs. Ford case.
8. Kenneth Khors Depo
Depositions taken 03/09/01 in Spurgeon v. Ford and 09/29/00 in Garcia vs. Ford.
9. Helen Petraukas Depo
Deposition taken in Spurgeon vs. Ford 03/21/01.
10. Hans Wickman Depo
Deposition taken 09/17-18/03 in Parker vs. Ford case.

The address and positions of the above named Volvo employee can be found in portions of his testimony as set forth in his deposition transcripts.

The addresses and positions of the above named Ford Motor Company employees can be found in portions of their testimony as set forth in their deposition transcripts.

PLAINTIFFS' EXPERTS:

11. Keith Friedman Live
Don Friedman
Xprts, L.L.C.
99 Aero Camino
Goleta, California 93117
(805) 571-1550
12. Carly Ward, Ph.D. Live
Biodynamics Engineering, Inc.
Post Office Box 722
Pacific Palisades, California 90272
(310) 454-0924
13. Scott Altman Live
Verifact Corporation
11220 West FM 1604 North
San Antonio, Texas 78254
(210) 523-5696

- | | | |
|-----|--|------|
| 14. | Bill Muzzy
WHMuzzy Consulting, LLC
3637 Peachtree Street
Slidell, Louisiana 70458-2339
(504) 641-1193 | Live |
| | | |
| 15. | Jack Sink, M.Ed.D., CRC, CVE, LPC
Sink & Associates, Inc.
2500 West Broad Street, Suite 307
Athens, Georgia 30306
(706) 543-9272 | Live |
| | | |
| 16. | Kenneth G. McCoin, Ph.D., C.F.A.
7670 Woodway, Suite 171
Houston, Texas 77063
(713) 626-0144 | Live |

PLAINTIFFS:

- | | | |
|-----|--|------|
| 17. | Patrick Parker
1307 County Road 8
Childress, Texas 79201
(940) 937-7024 | Live |
| | | |
| 18. | Dena Parker
1307 County Road 8
Childress, Texas 79201
(940) 937-7024 | Live |

The above named Plaintiffs' may testify regarding their knowledge to the accident made the basis of this lawsuit and to their own injuries and damages suffered.

OTHER WITNESSES:

- | | | |
|-----|--|------|
| 19. | Kathy Phillips
c/o R. Clay Milling
Henry, Spiegel, Fried & Milling, L.L.P.
950 East Paces Ferry Road
Suite 2450
Atlanta, GA 30326
(404) 832-8000 | Live |
|-----|--|------|

Ms. Phillips may testify as to her knowledge regarding a similar incident in which she and her husband were in, where the Ford F-250 rolled over and her husband died of positional asphyxiation.

20. John David Sparkman Depo
Akers Body Shop and Wrecker Service
404 South Main
Quanah, Texas 79252
(940) 663-2489

Deposition taken 08/14/03 in Parker vs. Ford case. Mr. Sparkman assisted the removal of Patrick Parker from his vehicle with The Jaws of Life.

21. Trooper Russell Conkling Depo
Hardeman County Sheriff's Office
P.O. Box 266
Quanah, TX 79252-0266
(940) 663-5374

Deposition taken 04/10/03 in the Parker vs. Ford case. Trooper Conkling's area of knowledge is relative to the investigation of the accident and the Plaintiffs' injuries.

22. Tony Tallant Depo
210 South Main
Quanah, Texas 79252
(940) 663-2933

Deposition taken 08/14/03 in the Parker vs. Ford case. Mr. Tallant's area of knowledge is relative to Patrick Parker's injuries and damages.

The following have knowledge and opinions relative to Patrick Parker's injuries, the cause of those injuries, their diagnosis, prognosis, and the reasonable and necessary treatments of those injuries (both in the past and in the future), the reasonable and necessary costs of those treatments (both in the past and in the future); and the Plaintiffs' damages.

23. **Baylor Institute Rehabilitation employees, agents, representatives and/or custodian of records**
3505 Gaston Avenue
Dallas, TX 75206
Mary Carlisle, M.D.
Bruce Lance, M.D.
Kathleen M. Sisler, M.D.

Milton Thomas, M.D.
Amy Wilson, M.D.
M. Adam
Rondi Blackburn, OTR
Valerie Blackmon, PT
K. Boudreaux, OTR
T. Briggs
R. Burch
P. Cort, OT
Deana Cox, R.D.
L. Dunn
P. Harty, RD, LD
Catherine Hoxie, OTR
J. Howley
Johnson
M. Kronenberger
S. Martin
G. Mayeux, DI
Tara Mooore, MPT
Lori Morris, CTR
Delva Pathy, R.N.
Ann Marie Ware
Paula Whittingham, R.N.
Amy Wilson, M.D.
S. Young, R.N.

24. **Childress Family Clinic employees, agents, representatives and/or custodian of records**
2020 Country Club Drive
Childress, Texas 79201
(940) 937-6187
25. **Childress Regional Medical Center employees, agents, representatives and/or custodian of records**
Post Office Box 1030
Childress, Texas 79201-1030
(940) 937-9125
26. **Out-Patient Visiting Doctors Clinic employees, agents, representatives and/or custodian of records**
Post Office Box 1030
Childress, Texas 79021
(940) 937-9198

27. **EMPI employees, agents, representatives and/or custodian of records**
599 Carnigan Road
St. Paul, MN 55126-4099
(800) 328-2536, ext. 8237
28. **Family Clinic employees, agents, representatives and/or custodian of records**
Dr. Thomas Darter
P.O. Box 1280
Childress, TX 79201
(940) 937-6187
29. **Hardeman County Memorial Hospital employees, agents, representatives and/or custodian of records**
402 Mercer St.
Quanah, TX 79252
(940) 663-2795
Dr. R.R. Makkena
L.M. Ouzts, M.D.
D. Garfield, R.N.
30. **Hardeman County EMS employees, agents, representatives and/or custodian of records**
P.O. Box 130
Chillicothe, TX 99225
(940) 663-2334
William Clay
Dr. Hernan
31. **Dr. Ramanchadra Rao Makkena and employees, agents, representatives and/or custodian of records**
P.O. Box 694
Quanah, TX 79252
(940) 663-6151
32. **Dr. Leo Mercer and employees, agents, representatives and/or custodian of records**
706 Denver Street
Wichita Falls, TX 75301
(940) 766-5256
33. **Dr. Stephen Neece and employees, agents, representatives and/or custodian of records**
1819 10th Street
Wichita Falls, TX 76301
(940) 723-6870

34. **North Texas Anesthesia employees, agents, representatives and/or custodian of records**
P.O. Box 5165
1105 Brook
Wichita Falls, TX 76307
(940) 723-1441
Keith Reeves
35. **North Texas Neurology Associates employees, agents, representatives and/or custodian of records**
1722 9th Street
Wichita Falls, TX 76301
(940) 322-1075
36. **Dr. Len Moore Ouzts employees, agents, representatives and/or custodian of records**
1000 Garland-Johnston Dr. #D
Vernon, TX 76384
(940) 553-4316
37. **Pathologists Bio-Medical Laboratories employees, agents, representatives and/or custodian of records**
3600 Gaston Ave.
Barnett Tower #707
Dallas, TX 75246
(214) 823-6492
38. **Physiatric Medicine Associates employees, agents, representatives and/or custodian of records**
Dr. Milton Thomas
8111 LBJ Freeway #375
Dallas, TX 75251
(972) 664-2534
39. **Project Walk employees, agents, representatives and/or custodian of records**
2738 Loker Avenue, Suite C
Carlsbad, California 92008
(760) 734-4588
Ted Dardzinski
Tammy Dardzinski
40. **Radiology Associates employees, agents, representatives and/or custodian of records**
808 Brook Avenue
Wichita Falls, TX 76301
(940) 766-0217

41. **Texas Diagnostic Imaging employees, agents, representatives and/or custodian of records**
c/o Per Se Technologies
9441 LBJ Freeway, Suite 400
Dallas, TX 75243
(972) 498-9799 ext. 6155
42. **Trans Star Ambulance employees, agents, representatives and/or custodian of records**
3917 Callfield Road
Wichita Falls, TX 76308
(940) 696-0151
Donovan Krtsenda
Jennifer Lase
43. **United Regional Healthcare System employees, agents, representatives and/or custodian of records**
1600 Eleventh Street
Wichita Fallas, TX 76301
(940) 764-8243
Klonie L. Berend, M.D.
Chris Ford, MDA
Michael Houck, D.O.
Leo C. Mercer, Jr., M.D.
Dr. Douglas Miner
Fayyaz Mirza, M.D.
David D. Moffat, M.D.
Armando Moreno, M.D.
Stephen R. Neece
R. Powell, PA-C
David Spencer, M.D.
Dr. Sundaresan
A. Bendl
Bledeoma, LVN
J. Brooks, RN.
K. Burks, R.N.
J. Campbell, P.T.
J. Cohner
K. Daria, PT
Frank Davis
C. Denehy, LVN
S. Dossett
Linda Draper, RN.
R. Dwyer, R.N.
Kevin Elkins, R.N.

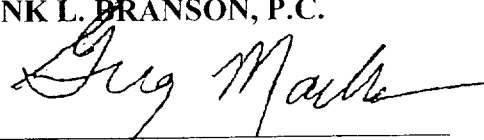
Zalena Fisher, LVN
R. Fling, R.N.
M. Fumia
N. Hardy, RN
Valerie Harwez, R.N.
E. Highlit
R. Hutson
E. January, LVN
M. Lary, LVN
Amanda Love, OTR
Martinez, RN
Tami McGriffin, MS, CCC
A. Medford, RRT
S. Poage
Deb Rapier
K. Roberson, RN
Shirley Shett
Y. Shirey
Doris Smith
Leah Smith
Pamela Smith
E. Speck, CRT
J. Starnes, LVN
C. Statton
Rebecca Thornhill, OTR
A. Wolf

44. **Neil R. Veggeberg, M.D. and employees, agents, representatives and/or custodian of records**
High Plains Rehab Association
P.O. Box 8876
Amarillo, TX 794
(806) 353-708
45. **George Wharton, M.D. and employees, agents, representatives and/or custodian of records**
HealthSouth Medical Center
2142 Research Row
Dallas, TX 75235
(214) 904-6888
46. **Dr. Mounir Zakhary**
304 South Park Lane, #B
Altus, Oklahoma 73522
(580) 477-7444

The Plaintiffs' intention to call any and all of the above-referenced individuals as Witnesses is subject to change. The Defendants will be notified promptly of any change in the Plaintiffs' List of Witnesses as they occur.

Respectfully submitted,

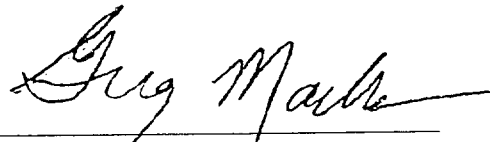
**THE LAW OFFICES OF
FRANK L. BRANSON, P.C.**



FRANK L. BRANSON
State Bar No. 02899000
J. GREGORY MARKS
State Bar No. 12994900
4514 Cole Avenue, 18th Floor
Highland Park Place
Dallas, Texas 75205
(214) 522-0200
(214) 521-5485 - Facsimile
ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served on Defendant's counsel Rickey L. Faulkner, Esq., Brown McCarroll, L.L.P., Post Office Box 3999, Longview, Texas 75606-3999 and Patrick X. Fowler, Esq., Snell & Wilmer, L.L.P., One Arizona Center, 400 East Van Buren, Phoenix, Arizona 85004-2202 of record, via facsimile and via certified mail on this the 19th day of September, 2003.



J. Gregory Marks

FORD MOTOR COMPANY'S WITNESS LIST

I. Ford expects to call the following individuals to testify live at the trial of this matter:

- A. Garry, S. Bahling
Vehicle Assessment Consulting, Inc.
2975 Bullock Drive
Metamora, MI 48455
- B. Jarrod W. Carter
Origin Engineering, L.L.C.
12314 E. Broadway Avenue
Spokane, WA 99216
- C. Edward A. Moffatt
Biomech Inc.
34 Tarry Lane
Orinda, CA 94563
- D. Michelle Vogler
Design Research Engineering
39810 Grand River Ave., Suite 150
Novi, MI 48375-2101
- E. James R. Vinson
Economic Consultant
1515 Patterson Road
Austin, TX 78733
- F. E. L. Workman
Workman Molina
1044 Calle Recodo, Suite B
San Clemente, CA 92673

II. Ford may call the following individuals to testify live at the trial of this matter:

- A. Patrick Parker
1307 County Rd. 8
Childress, Texas 79201
- B. Dena Parker
1307 County Rd. 8
Childress, Texas 79201



- C. Al Darold
Ragan Research Corporation
14050 Eckles Road
Livonia, MI 48150
- D. Tony D. Tallant
1210 S. Main Street
Quanah, TX 79252
- E. John David Sparkman
Akers Body Shop & Wrecker Service
404 S. Main
P.O. Box 162
Quanah, TX 79252
- F. Trooper Russell O'Neal Conkling
Hardeman County Sheriff's Office
P.O. Box 266
Quanah, TX 79252-0266
- G. Jeffrey J. Croteau
Exponent
21 Strathmore Road
Natick, MA 01760
- H. Bruno Barthelemy
Ford Motor Company
Office of General Counsel
Suite 300, Parklane Towers West
Three Parklane Blvd.
Dearborn, MI 48126-2568
- I. Rick Vanker
Ford Motor Company
Office of General Counsel
Suite 300, Parklane Towers West
Three Parklane Blvd.
Dearborn, MI 48126-2568
- J. Zaas, Carl
Ford Motor Company
Office of General Counsel
Suite 300, Parklane Towers West
Three Parklane Blvd.
Dearborn, MI 48126-2568

- K. Tom Patterson
Ford Motor Company
Office of General Counsel
Suite 300, Parklane Towers West
Three Parklane Blvd.
Dearborn, MI 48126-2568
- L. Custodian of Records TXU
1601 Bryan Street, #3-077
Dallas, TX 75201
- M. Joe Wills
Ford Motor Company
Office of General Counsel
Suite 300, Parklane Towers West
Three Parklane Blvd.
Dearborn, MI 48126-2568
- N. Debra Marth
Ford Motor Company
Office of General Counsel
Suite 300, Parklane Towers West
Three Parklane Blvd.
Dearborn, MI 48126-2568
- O. The following individuals have not been retained by Ford, but have been identified by Plaintiffs as expert witnesses. Ford reserves the right to call these individuals by deposition or at the trial of this matter or to use their written expert reports, if any, during discovery, pretrial motions, and direct examination and cross examination at the trial of this matter. However, by making such designation, Ford does not identify such experts as Ford's retained experts nor does Ford necessarily adopt or concede the accuracy of their facts, opinions or conclusions.
 - 1) Scott Altman
Verifact Corporation
11220 West FM 1604 North
San Antonio, Texas 78254
 - 2) Friedman, Keith
Don Friedman
Xprts, L.L.C.
99 Aero Camino
Goleta, California 93117

- 3) Kenneth G. McCoin
7670 Woodway, Suite 171
Houston, Texas 77063
- 4) William H. Muzzy, III
WHMuzzy Consulting, LLC
3637 Peachtree Street
Slidell, LA 70558-2339
- 5) Jack M. Sink
Sink & Associates, Inc.
2500 West Broad Street, Suite 307
Athens, Georgia 30306
- 6) Carly C. Ward
Biodynamics Engineering, Inc.
Post Office Box 722
Pacific Palisades, California 90272

The reports of the above listed individuals have been produced by Plaintiffs. These reports, according to Plaintiffs contain their opinions. Ford does not necessarily adopt or concede the accuracy of all information contained in the reports.

III. Ford may call the following witnesses to testify by records:

- A. Employees, agents, representatives and/or Custodian of Records for
Altus Surgery & Urology Associates
Zakhary, Mounir George, M.D.
304 South Park Lane, Suite B
Altus, Oklahoma 73521
(580) 477-7444
- B. Employees, agents, representatives and/or Custodian of Records for
Baylor Institute of Rehabilitation
3505 Gaston Avenue
Dallas, Texas 75246

- C. Employees, agents, representatives and/or Custodian of Records for
Blue Cross/Blue Shield of Texas
Lovelady, Debra Kay, Supervisor
901 South Central Expressway
Richardson, Texas 75080
(972) 766-4923
- D. Employees, agents, representatives and/or Custodian of Records for
Makkena, Ramanchadra Rao, M.D.
P.O. Box 694
Quanah, TX 79252
(940) 663-6151
- E. Employees, agents, representatives and/or Custodian of Records for
Childress Family Clinic
2020 Country Club Drive
Childress, Texas 79201
(940) 937-6187
- F. Employees, agents, representatives and/or Custodian of Records for
Childress Regional Medical Center
P. O. Box 1030
Childress, TX 79201
(940) 937-6371
- G. Employees, agents, representatives and/or Custodian of Records for
Out-Patient Visiting Doctors Clinic
P. O. Box 1030
Childress, Texas 79021
(940) 937-9198
- H. Conkling, Trooper Russell
Hardeman County Sheriff's Office
P.O. Box 266
Quanah, TX 79252-0266
(940) 663-5374
- I. Employees, agents, representatives and/or Custodian of Records for
EMPI
599 Carnigan Road
St. Paul, MN 55126-4099
(800) 328-2536, ext. 8237

- J. Employees, agents, representatives and/or Custodian of Records for
Hardeman County Memorial Hospital
402 Mercer Street
Quanah, TX 79252
(940) 663-2795
- K. Employees, agents, representatives and/or Custodian of Records for
Hardeman County Memorial Hospital
Radiology
402 Mercer Street
Quanah, TX 79252
(940) 663-2795
- L. Employees, agents, representatives and/or Custodian of Records for
Hardeman County EMS
P.O. Box 130
Cillicothe, TX 99225
(940) 663-2334
- M. Employees, agents, representatives and/or Custodian of Records for
Hardeman County Sheriff's Office
P. O. Box 266
Quanah, TX 79252-0266
(940) 663-5374
- N. Employees, agents, representatives and/or Custodian of Records for
Neurological Surgery of Wichita Falls
Stephen Neece, M.D.
1819 10th Street
Wichita Falls, Texas 76101
0/723-6870
- O. Employees, agents, representatives and/or Custodian of Records for
Project Walk
2738 Loker Avenue, Suite C
Carlsbad, California 92008
(760) 734-4588
- P. Employees, agents, representatives and/or Custodian of Records For
TXU
1601 Bryan Street, #3-077
Dallas, Texas 75201
14) 812-8915

- Q. Employees, agents, representatives and/or Custodian of Records
Texas Department of Public Safety
5805 North Lamar, Building B
Austin, Texas 78752
12) 424-7100
- R. Employees, agents, representatives and/or Custodian of Records for
Trans Star Ambulance
3917 Callfield Road
Wichita Falls, TX 76308
40) 696-0151
- S. Employees, agents, representatives and/or Custodian of Records for
United Regional Health Care System
1600 11th Street
Wichita Falls, TX 76301
40) 764-8243
- T. Employees, agents, representatives and/or Custodian of Records for
United Regional Health Care System – Radiology
00 11th Street
chita Falls, Texas 76301
- U. Employees, agents, representatives and/or Custodian of Records for
Veggeberg, Neil R., M.D.
High Plains Rehab Association
P. O. Box 8876
Amarillo, TX 79114
(806) 353-708
- V. Employees, agents, representatives and/or Custodian of Records for
Wharton, George, M.D.
HealthSouth Medical Center
2142 Research Row
Dallas, Texas 75235
(214) 904-6888

IV. Ford may call the following witnesses to testify by deposition:

Trooper Russell Conkling's deposition dated 4/10/03

Page/Line	through	Page/Line	Comments
4/22		4/24	
13/19		14/20	
26/9		26/20	Beginning with "Were you..."
43/6		44/4	Beginning with "Down in..."
44/17		44/21	
44/24		45/4	
46/12		47/8	
51/1		51/23	
71/2		71/6	Beginning with "you testified..."

Tony Tallant's deposition dated 8/14/03

Page/Line	through	Page/Line	Comments
5/17		5/19	
6/9		6/23	
14/23		15/12	
15/21		17/10	Beginning with "between the time..."

John Sparkman's deposition dated 8/14/03

Page/Line	through	Page/Line	Comments
5/7		5/13	
6/20		6/22	
7/6		7/17	Beginning with "how did you ..."
21/19		22/23	
26/8		26/19	
26/24		27/17	
32/5		32/23	
47/12		47/23	Beginning with "Which door ..."

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

(1)PATRICK PARKER and)	
(2) DENA PARKER)	
)	
Plaintiffs,)	
)	
VS.)	CIVIL ACTION NO. 2-02CV-182(DF)
)	JUDGE DAVID FOLSOM
(3)FORD MOTOR COMPANY, INC.)	
)	
Defendant.)	

PLAINTIFFS' EXHIBITS LIST

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Patrick and Dena Parker, Plaintiffs in the above-captioned case, and in accordance with the Scheduling Order in this case and files this their Plaintiffs' Exhibit List. It is anticipated that Plaintiffs may offer the following exhibits in the trial of this case.

1. Safety Directive 105 Letter dated 02/01/84 from D.E. Petersen.
2. 11/30/78 Roof Crush Test with G.T. Roll Bar - 1980 "F" series truck - Bates numbers 7875 0003804-3820.
3. 07/02/79 Roof Crush test of Accessory Bar Installation - 1980 Ram Regular Cab - Bates numbers 7875 000382 through 3827.
4. Crash Test 546 - 04/04/67 - Bates numbers
5. Videotape of Crash Test 546.
6. Ray Yerkes memo dated 05/22/99 re: List of cost reduction ideas.
7. Release concern dated 99/04/08.



8. Concern detail number C089544 dated 98/09/5.
9. Concern detail dated 98/06/8.
10. Volvo XC90 documents, CD-ROMS and video produced by Ford, including:
 - (1) Process instructions (assembly drawings) Body Upper XC90
 - (2) Volvo FKB Complete Vehicle - Crashworthiness
 - (3) Safety Product Development - XC90 (Slides 1-50)
 - (4) Volvo Test Report 256272 08/18/99
 - (5) Volvo Test Report 260663 04/10/00
 - (6) Volvo Test Report 258834 09/03/00
 - (7) Volvo Test Report 261760 12/06/00
 - (8) Volvo Test Report 262279 02/05/01
 - (9) 19 CD-ROMS
 - (10) Crash video
11. Car and Driver article regarding XC90.
12. P131 Cost Reduction Program (PHNC 02007-02012)
13. 1999 Program Presentation (PHNC 05102-05122)
14. 1999 PHN 131 Executive Summary (PHNC 05123-05216)
15. PHN 131 Target Setting Handbook (PHNC 07974-08046)
16. Program Direction Letter 1999 MY PHN 131 Light Truck (PHNC 03129-03390)
17. 1999 Budget P131 (PHNC 04332-04342)
18. 1999 Model PHN131 Program Profitability (PHNC 04875-04880)
19. Lifetime Engineering Forecast. December 1995 YTD actuals (PHNC04884-04886)
20. 1999 MY Commercial truck program Board of Directors Meeting Presentation (PHNC 04917-04927)
21. 1999 PHN131 Executive Summary (PHNC 04928-04952)
22. F Series 0/8500 1998 3rd Quarter VCAPS Audit (PHNC06027-06427)
23. P131 Program Super Duty Pickup (PHNC 06830)

24. ABS Financial Status Assessment Review (PHNC 06835-06956)
25. 1999 North American P131 Program 1999 model year warranty costs (PHNC 06957-07245)
26. PHN 131 Management Steering Team Program Review (PHNC 07367-07507).
27. PHN 131 Management Steering Team Review 12/17/93 (PHNC 07717-07854)
28. PHN 131 Management Steering Team Program Review 04/26/94 (PHNC07873-07973)
29. 1998 PHN Program Review (PHNC 08047-08564).
30. NHTSA Proposed Rule 02-06: Notice 4
31. SAE 980210: Roof Crush Versus Occupant Injury from 1998 to 1992 NASS
32. Ford's Intra-company communication, "Third Report on Conceptual Interviews with Truck Owners (Pickup and 4X4)," dated 1-16-64, by R.J. Eggert (Bates 141-396-396).
33. Ford Engineering Staff Report, "1965-66 Roof Collapse Evaluation," dated 3-1-67, by R.C. Dodt and R.J. Berton. Report No. S-67-5 (Bates RC001485-001528).
34. Ford's Intra-company communication, "Protection Offered by Shoulder Belt (3-Point System)," dated 9-19-67, by Richard G. Snyder, to Mr. John Versace (Bates 141-319-321).
35. Ford's white paper "Safety Benefit/Cost Summary," dated 11-7-67, by P.C. Bertelson (Bates AERZ 30721-30726).
36. Ford's Intra-company communication, "Comments of Safety Benefit/Cost Summary," dated 11-21-67, by J.S. Seward (Bates 00100001588).
37. Ford's Intra-company communication, "Cost/Benefit Analysis of Car Safety Expenditures," dated 11-22-67, to Mr. J. Versace (Bates AERZ 30727-20729).
38. Ford's Report, "Accident Reviews: Rollovers," dated 11-30-67, by R.C. Dodt from Automotive Safety Research Office. Report No. S-67-36 (RC000010-000022).
39. Ford's Intra-company communication, "Analysis of Cornell Data for Rollover Crash," dated 2-7-68, by Paul E. Geck. Safety Testing and Vehicle Evaluation Department, to Mr. H. G. Brilmyer, including all attachments (Bates RC001459-001461).

40. Ford's Intra-company communication. "Rollover Accidents: A Basis for Establishing Future Roof Strength Performance Requirements." dated 6-28-68. by J. R. Weaver to Mr. H. G. Brilmyer (Bates RC001548-001553).
41. Ford engineering staff intra-company letter. dated 7-8-68, "Roof Strength Study," from J. R. Weaver to Mr. H. G. Brilmyer, including all attachments, tables, appendix, diagrams, and sketches (AERZ 24131-24149).
42. Ford's Intra-company communication. "Injury in Rollover Accidents." dated 7-9-68. by J.R. Weaver to R.B. MacLean (Bates RC001573-RC001574).
43. Ford document titled "Comments of Ford Motor Company, Inc. on Advance Notice of Proposed Rule Making." dated 7-22-68. in letter format from J.C. Eckhold to NHTSA. in title "Intrusion – Passenger Cars, Multipurpose Passenger Vehicles, Trucks, Buses." (Bates RC012555-012560).
44. Ford publication, "Data on the Motor Vehicle Transportation System in the United States." dated November 1968, by the Automotive Safety Research Office (RC001575-001587).
45. Ford's Intra-company letter. "Rollover Impact Protection Requirements," dated 11-13-68, from H.G. Brilmyer to Mr. Byrne (Bates RC001588-001591).
46. Ford's Intra-company letter. "New Mexico Rollover Accident Report," dated 1-6-69. by Engineering Staff. to Mr. H.G. Brilmyer. with all attachments (Bates RC001594-001600).
47. Ford Intra-company letter. "197X Truck Package Clinic (68/C-56-PF)." dated 10-24-68, by John A. Frechtling to Mr. Philip Caldwell. with all attachments (Bates AERZ 30730-30736).
48. Ford's Intra-company letter. "Status of Research and Engineering Programs Pertinent to Improved Rollover Impact Protection," dated 2-13-69, from H.G. Brilmyer to H. March (Bates RC001602-001605).
49. Ford's Intra-company letter. "ASRA Presentation of Rollover Based on Actual Accident Cases and Laboratory and Proving Grounds Tests." dated 5-7-69, prepared by Engineering Staff, with all attachments (Bates RC001660-RC001667).
50. Ford's Engineering Staff Intra-company letter. dated 5-20-69, "Regression and Correlation Analysis on the Roof Crush Data." from Shrawan K. Singh to Mr. H.G. Brilmyer (Bates RC001011-001024).
51. Ford's Intra-company report, "Passenger Car Rollover Without Impact – A Study of AMA Cases, Proving Ground Tests and a 1968 On-the-Scene New Mexico Evaluation." dated

- 5-23-69, from Robert C. Dodt. to Mr. H.G. Brilmyer, with all attachments (RC001643-RC001654).
52. Ford's report, "Rollover Protection Plan," dated 5-28-69, by Car Body Systems Engineering (Bates RC001655-001657).
 53. Ford Status report, "1972 Rollover and Pillars," dated 7-30-69, with attachments (Bates RC001668-1671).
 54. Ford's Intra-company letter, "Suggestions for Rollover Test Method Based on Rollover Accident Environment – AMA Cases," dated 9-25-69, by Robert C. Dodt to R.J. Berton, with all attachments (Bates RC001717-001718).
 55. Ford Engineering Staff Report, "A Study of Some Rollover Accidents," dated 9-25-69, by E.S. Grush, with all attachments (Bates RC001709-001716).
 56. Ford's Intra-company report by Engineering Staff, "Rollover Statistics," dated 10-20-69, by John Versace (Bates AERZ 24172-24180).
 57. Ford's Intra-company letter, "Corporate Objective for Roof Crush Strength – H.T. Tillotson's letter of 1-6-70," dated 1-16-70, by Robert J. Berton to H.G. Brilmyer, with all attachments (Bates RC001745-001754).
 58. Report titled, "Rollover Protection," dated 2-25-70, by Ford Car Body Systems Engineering (3 pages plus attachments) (Bates RC001769-001775).
 59. Ford report, "Roof Intrusion Protection – Passenger Cars," dated 12-23-70, with all attachments (Bates AERZ 28063-28070).
 60. Ford white paper, "Rationale for a Maximum Allowable Roof Intrusion," dated approximately 1970 (Bates RC002010-002010).
 61. Ford report, "Roof Intrusion Protection for Passenger Cars Proposed Motor Vehicle Safety Standard," dated 2-18-71, by Safety and Emissions Programs, with all attachments (Bates RC002012-2020).
 62. Produce Ford white paper, "Suggested Company Response to Docket 2-6, Notice 4 Roof Intrusion Protection," dated 2-25-71, by Body Engineering Office, with all attachments (Bates RC002022-002024).
 63. Ford Product Development Group's Intra-company letter dated 3-3-71, "NAAO Working Safety Committee Meeting – March 3, 1971," to Mr. R.B. Alexander, et al. from J.O. Jay, with all attachments (Bates RC011622 - 011630).

64. Ford's Intra-company letter, "An Alternative to Current Automotive Safety Regulatory Programs," dated 3-8-71, by T.J. Feaheny, to R.W. Markely, Jr., et al (Bates AERZ 30737-30746).
65. Ford report, "Roof Intrusion Protection for Passenger Cars, Proposed Motor Vehicle Safety Standard," dated 3-22-71, by Ford Safety and Emissions Programs (Bates RC002111-002117).
66. Ford's Intra-company letter, "Roof Intrusion Protection (Docket 2-6, Notice 4)," dated 3-17-71, by W.C. McDonald to J.C. Eckhold (Bates RC002121-002123).
67. Ford's Intra-company letter, "Meeting with NHTSA Roof Intrusion Protection," dated 3-26-71, by W.E. Brown (Bates RC002124-002125).
68. Ford's Intra-company letter, "Notice of Proposed Rule Making – Roof Intrusion Protection for Passenger Cars," dated 4-2-71, by E.A. Reickert to J.C. Eckhold (Bates RC002138-002138).
69. Ford letter, "Notice of Proposed Rule Making – Roof Intrusion Protection for Passenger Cars," dated 4-5-71, from J.C. Eckhold to NHTSA. This will include attachments, "An Assessment of Roof Crush as a Contributor to the Automobile Safety Problem" by E.S. Grush, with all attachments (Bates RC012561-012575).
70. Ford Intra-company letter, "Roof Crush Statistics for Docket 2-6: Notice 4," dated 4-5-71 by John Versace (Bates RC002139-002147).
71. Ford Intra-company letter, "Docket 2-6, Notice 4 – Roof Intrusion," dated 4-6-71, by J.C. King, with all attachments (Bates 002164-2172).
72. Ford letter, dated 4-22-71, from J.E. Lundy to Mr. Henry Ford II. and Mr. L.A. Iacocca, with all attachments. The subject is Washington conversation and security problem (Bates ANG1237-1238).
73. Ford Intra-company letter, "Comparison of Ford Motor Company, Inc. Comments with Those of Competitive Companies, on Notice of Proposed Rule Making – Roof Intrusion Protection for Passenger," dated 4-27-71 from R.E. Kimball to R.B. Alexander, et al (Bates RC002191-002194).
74. Ford Report, "An Analytical Method for Assessing Vehicle Roof Strength," dated 4-29-71, by John Versace (Bates RC000628-000670).
75. Ford inter-office communication, "Provisions for Roof Intrusion Protection for Passenger Cars," dated 5-10-71, by W.R. Hunter to W.E. Moore, with all attachments (Bates RC002241-RC002242).

76. NAAO Working Safety Committee agenda and meeting minutes from April 22, 1971 (Bates RC011648-011672).
77. Ford report, "Roof Intrusion Protection for Passenger Cars," dated 5-19-71, draft, with all attachments (Bates RC002251-002264).
78. Ford white paper, "Roof Intrusion Protection for Passenger Cars," dated 6-2-71, by Safety and Emissions Programs (Bates RC002268-002271).
79. Ford General Product Development Safety Program Letter, 74S-7, dated 6-15-71, by T.J. Feaheny, with attachments (Bates RC002277-002278).
80. Ford Intra-company letter, Evaluation of Empirical Method for Determining Roof Crush Values," dated 7-2-71, by Paul Kim and C.R. Wilk (Bates RC012561-012575).
81. Ford white paper, "1974 Roof Intrusion Program," dated 8-5-71, by Car Product Planning, with attachments and exhibits (Bates RC002288-002293).
82. Ford's Intra-company report, "Restraint Systems Effectiveness," dated 9-23-71 by John Versace, with all attachments. Authors include E.S. Grush, Sherman Henson, Orville Ritterling (Bates RC024448-024566).
83. Ford reports, agendas, meeting minutes, from NAAO Working Safety Committee meeting of 10-21-71 (Bates RC011738-011756).
84. General Product Development Safety Program Letter 74S-7-S1, Roof Intrusion Protection for Passenger Cars, by R.C. Graham, dated 11-24-71 (Bates RC002294-002294).
85. Ford report "ESV Rollover Test Methods," dated 1971, by Mr. C.R. Emnus, Ford United Kingdom (Bates RC007071-007075).
86. Ford General Product Development Safety Program Letter 74-S-7-S2, Roof Crush Resistance—Passenger Cars, FMVSS 216, by R.C. Graham, dated 1-11-72 (Bates RC002428-002429).
87. Program Description Book for 1973 F-Series Program, dated 2-7-72.
88. Ford white paper, "Rollover Testing Repeatability (Ford Testing Versus NHTSA)," dated 4-18-72, by Advance Body Engineering (Bates RC002451-002455).
89. Ford agenda, meeting minutes, reports, etc. from NAAO Working Safety Committee Meeting of 4-20-72 (Bates RC011389-011403).

90. Ford agenda, meeting minutes, reports, etc. from NAAO Working Safety Committee Meeting of 7-20-72 (Bates RC011404-011412; RC011413-011422).
91. Ford agenda, meeting minutes, reports, etc. from NAAO Working Safety Committee Meeting of 10-26-72 (Bates RC014361-014367).
92. Inter-office communication. "Documentation of Test Results Relating to FMVSS Requirements." 11-27-72, by F.J. Finkenauer, Jr. to G.J. Lawton (Bates AERZ 30769-30770).
93. Ford inter-office letter. "PEO Internal Procedure for Potential Critical Product Problems." dated 11-28-72, by J.W. Byrne to J. Forgione (Bates AERZ 30771-30779).
94. Ford quarterly report dated 12-31-72, by H.T. Tillotson, project name "In-house Safety Car." with all attachments (Bates 73535-73544).
95. Ford General Product Development Safety Program Letter, "Roof Crush Resistance- - Passenger Cars. FMVSS No. 216," dated 1-8-73, No. 74S-7-S3, by W.C. McDonald (Bates RC002467-002468)
96. Ford inter-office letter, "FMVSS Test and Reporting Procedures and Safety Factors," dated 2-23-73, by J.C. King to Mr. R.E. Allen, et al (Bates AERZ 30780-30783).
97. Ford report. "Ford Experimental Safety Vehicle." dated April 1973. Final Report, Contract No. DOT-OS-20005, prepared for DOT. This will include previous edition of this type of report internal to Ford, prepared by Body Safety Engineering Department (RC013151-013386 and RC01388-013491).
98. Ford inter-office report, "Long-Range Effectiveness of 1976 Restraint Proposal," dated 6-25-73, by John Versace, with attached report by L.J. Tomiko and E.S. Grush (RC024408-24429 and RC02500-02520).
99. Ford agenda, meeting minutes, and reports from the NAAO Safety Subcommittee Meeting of 7-26-73 (RC011692-011705).
100. Ford inter-office report, "Technical Notes for the Rollover Docket," dated 8-29-73, by John Versace, with all attachments (RC000595-000627).
101. Ford agenda, meeting minutes, and reports from the NAAO Safety Subcommittee meeting of 11-15-73 (RC011512-011520).
102. Ford agenda, meeting minutes, and reports from the NAAO Safety Subcommittee meeting of 3-21-74 (RC011524-011539).

103. Ford report, "Occupant Protection During Vehicle Rollovers," dated 6-4-74, from the fifth International Technical Conference on Experimental Safety Vehicles, by K. Stone, Ford Motor Company, Inc. Limited (RC013492-013512).
104. The agenda, meeting minutes, and all attachments to these documents for the Ford NAAO Safety Subcommittee Meeting, 9-19-74 (RC011598-011621).
105. Ford report, "FMVSS 208 Cost Effectiveness Analysis- - Methodology," dated 10-9-74 (RC000359-000369).
106. Ford report, "Occupant Protection in Vehicle Rollover," dated January 1975, Contract No. Con-2598-SV, Technical Research, Ford of Britain (RC002537-002586).
107. Ford letter dated 2-10-76, from J.C. Eckhold, to NHTSA (Roger Compton), with all attachments (7875 829 - 7875 836).
108. Ford report, "Review of RSV Phase I Report," dated 6-8-76 by John Versace, with all attachments. ASO Report No. S-76-7 (ASO Report No. S-76-7).
109. Report, "Ford Motor Company, Inc. Responses to NHTSA FMVSS 208 - - Occupant Crash Protection," dated approximately 4-15-77, comments since 1969 (AERZ 28682-28724).
110. Ford letter from J.C. Eckhold to NHTSA (Joan Claybrook), dated 12-12-77, with all attachments (AERZ 28725-28756).
111. Ford white paper, "Joint Meeting of Engineering and Research Subcommittee and Manufacturing and Supply Subcommittee," dated 11-18-80 (AERZ 28757-28763).
112. Ford letter dated 5-4-87, from R.H. Munson to Barry Felrice, NHTSA, on FMVSS 216, and subsequent letters of 1-27-89, 3-15-89 (RC012611-012611, RC012612-012612).
113. Ford letter, dated 6-26-89, from R.H. Munson to NHTSA (R.E. Wood), with all attachments (RC012624-012630).
114. Ford letter, dated 12-20-89, from R.H. Munson to NHTSA (Jerry R. Curry), with all attachments. Subject: Notice of Proposed Rule Making on Light Truck Roof Crush Docket 89-22, Notice 1 (RC021059-021069).
115. Product Planning Subcommittee meeting minutes of 11-28-78.
116. Ford memo, dated 11-4-91, titled "Vehicle Rollover." (EXPI 1233-1233)
117. Ford letter dated 5-7-92, Corporate Safety Segment Design Guidelines for Resistance to

Rollover.

118. Ford documents related to 6-24-92, Outline for Stability Discussion, OMB, DOT & NHTSA Visit to Ford (AABD 6968-6986; AABD 7137-7253; AABZ 7286-7286; AAFB 9199-9199).
119. Ford letter dated 6-14-93, Corporate Safety Segment Design Guideline for Resistance to Rollover.
120. Agenda, Product Planning Subcommittee meeting of 7-6-87, including "Approval of Safety and Damage Ability Design Guidelines. (AERR 1118-1165)"
121. Ford Technical Report, no date, titled "Stability Index Spreadsheet," with and without handwritten comments on document (RGRW 2508-2510).
122. Ford document entitled, "Rollover Impact Protection Requirements," dated November 13, 1968 (RC00158-001591).
123. Ford document entitled "The Light Truck Engineering Program Report," September 3, 1980 (RGR 436-438).
124. Ford Light Truck Safety Guideline Strategy dated February 27, 1987 (BII 90383-90456).
125. Documents dealing with 1994 Light Trucks Roof Crush dated March 8, 1991 (06632-06677).
126. Ford document entitled "Ford 1974-1976 Master Plan Rollover and Side Impact" dated 1971.
127. Ford memorandum "Roof Crush Minimum Structural Thickness" from J. M. Erkert dated June 25, 1971.
128. Ford memorandum "1978-Model North American Truck Programs" from William Bourke dated July 8, 1976.
129. Ford Roof Crush Safety Guideline Proposal dated December 12, 1991 and any and all subsequent Roof Crush Safety Guideline proposals (AERZ 12146-12148).
130. "Roof Crush Variability Study using FEA and DOE" dated December 23, 1994.
131. DPG Safety Task Force Accident Report dated September 2, 1995 (EXPU 1437-1439).
132. "Comments of Ford on NHTSA Docket No. 1999-5572 Notice 2; Request for Comments - Federal Motor Vehicle Safety Standard 216, December 4, 2001 (3720 11220-11226).

133. "Supplemental Comments of Ford on NHTSA Docket No. 89-22 Notice 1; Notice of Proposed Rule Making - Light Truck Roof Crush Resistance, April 23, 1990 including Notice 1, 54 Fed. Reg. 46275, November 2, 1989.
134. "Comments of Ford on NHTSA Docket No. 91-68 Notice 1; Advance Notice of Proposed Rule Making for Rollover Prevention, April 2, 1992 including Docket No. 91-68, Notice 01, 56 Federal Register, pp. 242-252, January 3, 1992.
135. Ford Engineering Design Standard Deviation document dated June 11, 1980.
136. Ford memoranda regarding the 1985 Mercury Cougar OR-7's compliance with FMVSS 216 dated March 6, 1984.
137. The National Highway Safety Bureau document entitled "Roof Intrusion Protection for Passenger Cars" dated January 6, 1971.
138. The National Center for Statistics and Analysis document entitled "Characteristics of Fatal Rollover Crashes" dated April of 2002.
139. Program Description Books applicable to any PN96 vehicle.
140. Drawings of the roof assembly of the subject vehicle.
141. Documents, including, but not limited to, videos, test reports and electronic data that refer to crash test 546 (Bates RC010264-10278).
142. All documents, including, but not limited to, videos, test reports and electronic data that refer to crash test 619 (RC025029-25042).
143. All documents, including, but not limited to videos, test reports and electronic data that refer to crash test 116 (RC008354-008371).
144. All documents, including, but not limited to videos, test reports and electronic data that refer to the CRIS Fixture Test: TEN 6802, PH6802: 1993 F-350 Rollover Test.
145. All documents, including, but not limited to videos, test reports and electronic data that refer to AutoLiv Test: B180196: Explorer Curb Trip Test including RC27442, RC27512, RC27531.
146. All documents, including, but not limited to videos, test reports and electronic data that refer to AutoLiv Test: B180207: Explorer Corkscrew Test (RC27470, RC27513, RC27528).

147. All documents, including, but not limited to videos, test reports and electronic data that refer to AutoLiv Test: B180209: Explorer Corkscrew Test (RC 27470-27507; RC27508; RC27528).
148. All documents, including, but not limited to videos, test reports and electronic data that refer to AutoLiv Test: B180210: Explorer Corkscrew Test (RC27470-27507; RC27514; RC27528).
149. All documents, including, but not limited to videos, test reports and electronic data that refer to AutoLiv Test: B180219: Explorer Dolly Rollover Test (RC27257-27289; RC27515; RC27522).
150. All documents, including, but not limited to videos, test reports and electronic data that refer to AutoLiv Test: B180220: Explorer Dolly Rollover Test (RC27768-27802; RC27509; RC27523).
151. All documents, including, but not limited to videos, test reports and electronic data that refer to AutoLiv Test: B190015: Explorer Curb Trip Test (RC27325-27361; RC27521; RC27524).
152. All lists, logs or data banks that refer to any drop tests, static crush testing and/or rollover testing from 1960 to the present, including CRIS testing information.
153. Field accident data and documents regarding other similar incidents relating to rollover and/or roof crush accidents for Ford vehicles for model years from 1990 to 2001 that were produced by Ford on August 8, 2003 and August 18, 2003.
154. The Owner's Manual for the subject vehicle.
155. Vehicle invoice and weight information provided by Ford.
156. Documents in regards to the advertising or promotion of the subject vehicle including, but not limited to, brochures, commercials, and print advertising.
157. Copies of all produced television commercials for the "No Boundaries" advertising campaign that refer or relate to pickup trucks.
158. All "Top Lines" for the focus groups conducted in relation to the "No Boundaries" campaign.
159. Annual reports produced by Ford for years 1997-2001; 1980 through 1990 and 1992-1994.
160. All documents that refer, reflect or relate to the manufacture, sale, and/or maintenance of the Parker vehicle.

161. Article entitled "Safer Than a Breadbox," Alex Law, Auto Week, June 10, 2002.
162. The June 11, 1980 Ford Engineering Design Standard Deviation regarding the 1985 Mercury Cougar XR-7.
163. All documents that refer, reflect, or relate to Ford's Crash Test 2625.
164. All documents that refer, reflect or relate to Ford's Crash Test 2626.
165. Information related to rollover testing performed by Exponent, Inc. for the platform vehicle including CD and documents on Dolly Rollover Crash Test 2000 Ford F-150 SLT 7700 on 10/18/02
166. FMVSS 216 Roof Crush Development, 1996 PN96 Supercab F Series, Right Front Roof 7875 23274-7875 23295
167. Advertising by Ford, including:
 1. The Park and JW Thompson Ad: Ford F Series - Westside Story; Ad No. D-5986-1
 2. The Park and JW Thompson Ad: Military Playbill Ad No. D-6289-1
 3. The Park and JW Thompson Ad: Ford F Series - Westside Story; Ad No. D-6341-1
 4. The Park and JW Thompson Ad: Ford F Series - Johnn Cash; Ad No. D-5985-1
 5. The Park and JW Thompson Ad: Ford F Series - Westside Story; Ad No. D-6230-1
 6. The Park and JW Thompson Ad: Military Ad; Ad No. D-6110-1
 7. The Park and JW Thompson Ad: Ford F Series - 2001 Super Bowl Ad; Ad No. D-5137-1
 8. The Park and JW Thompson Ad: Ford BPN "Siberia" Ad; Ad No. D-6310-2 The Park and JW Thompson Ad: Ford T.O. I. King Ranch Ad; Ad No. D-6645-2
 9. The Park and JW Thompson Ad: Ford F Series - Westside Story; Ad No. D-6093-1
 10. The Park and JW Thompson Ad: Ford F Series, "2001 Superduty Super Bowl"; Ad No. D-5137-1
 11. The Park and JW Thompson Ad: Ford F Series - Rocky; Ad No. D-5987-1 The Park and JW Thompson Ad: Ford F Series - Hurricane; Ad No. D-6029-1
 12. The Park and JW Thompson Ad: Other Trucks; Ad No. D-4807-0
 13. The Park and JW Thompson Ad: F Series, Before, After, During; Ad No. D-4621-0
 14. The Park and JW Thompson Ad: Ford F Series - Before, After, During; Ad No. D-5357-1

15. The Park and JW Thompson Ad: Ford F-Series "ARMY" Ad No. D-5358-1
 16. The Park and JW Thompson Ad: Ford F-Series - "NO AUTOGRAPHS"; Ad No. D-5359-1
 17. The Park and JW Thompson Ad: Ford F-Series "Country Music Hall of Fame"; Ad No. D-5557-1
 18. The Park and JW Thompson Ad: Ford F-Series - Bad Cheese; Ad No. D-5356-1
 19. Videotape of JW Thompson ads: You've Got Mail (11/03/00); A-Team (11/20/00); Fire Crew(10/03/00); You've Got Mail (07/01/01); and A-Team (07/01/01)
 20. Documents regarding Blue Oval campaign.
168. Potential Failure Mode Analysis and Effects Analysis FMEA: An Instruction Manual (7875 21518- 21566)
 169. 1994 Light Trucks Roof Crush (7875 0006632-6677)
 170. Roof Crush Design Margin Revisitation Study (7875 25566-25579)
 171. PHN 131-SP7 Channel Cab Durability Test, 07/18/96 (PHNA 09490-09980)
 172. Roof Crush: Project U6221 (7875 0006557-6620)
 173. Light Truck Safety Guideline Strategy. 12/87. 7875 0006793-7875 0006826
 174. Release/Concerns regarding the PHN roof and/or components, including Bates numbers: PHNA 26057-74; 26242-62; 26641-46; 26263-69; 26673-76; 26075-79; 26664-72; 26270-74; 26412-17; 26677-79; 26300-06; 26661-63; 26418-38; 26636-40; 26280-83; 26284-90; 26626-30; 25985-91; 26647-60; 26275-79; 26857-69; 26780-88; 26797-80; 26564-68; 26793-96; 25917-20; 25910-14; 25921-23; 26569-73; 25915-16; 25924-34; 26598-99; 25935-41; 26742-65; 26766-69; 26025-28; 25952-55; 26558-61; 26552-55; 25956-57; 26562-63; 25962-65; 26556-57; 26018-24; 26037-51; 06200-02; 06218;26452-56; 27401-05; 27397-00; 26459-60; 26439-43; 26820-21; 26194-98; 27477-80; 26468-70; 26457-58 ; 26450-51;26444-45; 27485-88; 26848-49; 27406-09; 26199-02; 26811-12; 25894-96; 26839-42; 26229-32; 26233-35; 26236-41; 26831-32; 26822-25; 26833-35; 26208-11; 26600-03; 26215-19; 26615-18; 26220-22; 26631-35; 26212-14; 26619-21; 26680-83; 26052-56; 26604-06; 26894-99; 26580-87; 26006-13; 26863-69; 26780-88; 26797-00; 26564-68; 26793-96; 25917-14; 26574-77; 25921-23; 26578-79; 26569-73; 25915-16; 25924-27; 25942-48; 26870-72; 25928-34; 25949-51; 26594-99; 25935-41; 26762-65.
 175. Oral Presentation: Research Priorities in Crashworthiness, Adele Derby, NHTSA 7875 18262-18271
 176. 12/12/77 letter from Eckhold to Joan Claybrook (7875 000510-000541)

- 177. Staff Items. Washington Affairs Office 03/30/98 (7875 32300-32329)
- 178. Staff Items. Washington Affairs Office 05/26/98 (7875 32343-32371)
- 179. Staff Items. Washington Affairs Office 10/05/98 (7875 32399-32425)
- 180. Staff Items. Washington Affairs Office 04/19/99 (7875 32446-32466)
- 181. Washington Affairs Safety Status Report. Advanced Safety Review Committee Meeting 09/20/95 (7875 32536-32544)
- 182. Washington Affairs Safety Status Report. Advanced Safety Review Committee Meeting 07/23/97 (7875 32619-32652)
- 183. Washington Affairs Safety Status Report. Advanced Safety Review Committee Meeting. 05/20/98 (7875 32653-32662)
- 184. Washington Affairs Safety Status Report. Advanced Safety Review Committee Meeting. 07/29/98 7875 32663-32679
- 185. Automotive Safety Review Meeting, Safety Regulatory Update, 09/29/98 (7875 32682-32705)
- 186. E-mail from Ken Peer re PHN 131 Safety at Meeting Minutes on 01/25/96 (PHNA 15470)
- 187. E-mail from Wei Hong re PHN131 Safety PAT Meeting Minutes on 03/21/96

DOCUMENTS REGARDING PLAINTIFFS' EXPERTS:

- 188. Curriculum vitae, report and photographs of Keith Friedman/Don Friedman of Xprts.
- 189. Exemplar vehicle parts produced at deposition of Keith Friedman.
- 190. Curriculum vitae, report and photographs of Scott Altman, Verifact.
- 191. Curriculum vitae, report and photographs of Dr. Carley Ward.
- 192. Curriculum vitae, report and photographs of Bill Muzzy.
- 193. Curriculum vitae, Life Care Plan and Addendum of Jack Sink.

194. Curriculum vitae, report and supplemental report of Kenneth G. McCain, PH.D., C.F.A.

DEPOSITION EXHIBITS:

195. Deposition Upon Written Questions of Texas Department of Public Safety

196. Exhibits of Carl Zaas deposition taken in the Parker vs. Ford case June 24, 2003 including but not limited to:

1. Interoffice Memo dated 1/19/95 to B. Barthelemy, Objective: Roof crush study on PHN131 four-door super cab, Bates Nos. 7890 0082 through 0086
2. Interoffice Memo dated 10/11/094 to B. Barthelemy, Subject: Proposed Alternate Roof Bow Design to Enhance Roof Crush Resistance, Bates Nos. 7890 0076 through 0078
3. Interoffice Memo dated 10/26/94 to B. Barthelemy. Subject: Proposed Alternative Roof Bow Design to Enhance Rear Roof Crush Resistance Bates Nos. 7890 0079 through 0081
4. Intracompany Memo dated 4/29/71 An Analytical Method for Assessing Vehicle Roof Strength, Bates Nos. 3008 0491 through 0532
5. Color Photograph
6. Color Photograph
7. Bill Ford Video Clip #4
8. Color Photograph
9. Vehicle Safety & CAE Technology Department Body Structure Analysis/Engineering, Roof Crush Variability Study Using FEA and Doe, Bate Nos. 7875 14362 through 14419

197. Exhibits of Richard W. Vanker deposition taken in the Parker vs. Ford case June 19, 2003, including but not limited to:

1. Memo dated 5/25/99 from Ray Yerkes, with attached list of cost reduction ideas
2. Release/Concern Cover dated 99/04/08
3. Concern Detail Number C1089544 dated 98/19/15
4. Concern Detail dated 98/06/18
5. Pillar-Front Body, Number YC35-1502516-7-AB
6. Pillar-Front Body, Number F81B-2502517-AP
7. Pillar-Front Body Number YC35-2502516-AB
8. Copy of photograph
9. Analytical Sign-Off for PHN-131 CP Design April 1996

10. Letter dated 2/1/84 from D.E. Petersen
11. Video clip of Volvo ad (not attached to the deposition)
12. Automotive Safety Research Office Safety Engineering Evaluation
13. NHTSB Notice of Proposed Rulemaking, January 1971
14. Printout of e-mail dated 2/3/95
15. Video clip of deposition of Bill Ford
16. Video clip of deposition of Jacques Nasser
17. F-150 crash test video clip
18. Volvo crash test video clip

198. Exhibits of Carly Ward, Ph.D. deposition taken in the Parker vs. Ford case 09/03/03 including but not limited to:

- (1) Binder of Photos
- (2) Diagram
- (3) Surrogate Study
- (4) Literature Binder
- (5) Report
- (6) Rollover Crash Study by Rechnitzer and John Lane
- (7) Videotape
- (8) Pickup weight information
- (9) Ledger Sheet
- (10) List of deposition testimony
- (11) List of trial testimony
- (12) Case summary file
- (13) Red working file
- (14) Handwritten notes
- (15) Notebook
- (16) Notebook

199. Exhibits of Bruno Barthelemy deposition taken in the Parker vs. Ford case April 3, 2003. including but not limited to:

- (1) Interoffice Memo dated 10/11/94 to B. Barthelemy, Subject: Proposed Alternative Roof Bow Design to Enhance Roof Crush Resistance, Bates Nos. 7890 0076 through 0078
- (2) Interoffice Memo dated 10/26/94 to B. Barthelemy, Subject: Proposed Alternative Roof Bow Design to Enhance Rear Roof Crush Resistance, Bates Nos. 7890 0079 through 0081
3. Interoffice Memo dated 01/19/95 to B. Barthelemy, Objective: Roof crush study on PHN131 4 door super cab, Bates Nos. 7890-0082 through 0086

4. Ford Analytical Sign-Off for PHN-131 CP Design April 1996 Vehicle Center 5, Bates Nos. 7890 0004 through 0075
 5. 1998 PHN131 - Total Program Work Plan
 6. Roof Crush: Project U6221 Bates No. EXPN 0541 through 0558
 7. PMT #1 Fast Track Summary
200. Exhibits of Bruno Barthelemy deposition taken in the Parker vs. Ford case on 09/12/03, including but not limited to:
- (8) Plaintiffs' Notice of Intent to Obtain the Oral/Videotaped Deposition of Designated Corporate Representative of Ford Motor Company
 - (9) Executive Summary (PHNC 05123-05216)
 - (10) Directive - Produce Safety Planning and Implementation (F030764-30765)
 - (11) E-mail from J. Wagner (7875 22873 and 22874)
 - (12) Light Truck Safety Design Guideline Strategy (7875 0006793-0006826).
 - (13) 1994 Light Trucks Roof Crush (7875 00066320006677)
 - (14) Vehicle Safety and CAE Technology Department Body Structure Analysis/Engineering (7875 14362-14419)
 - (15) Concern Detail C10638511, 06/23/96 (PHNA 26622-26625)
 - (16) Concern Detail C1095494, 03/19/99 (PHNA 25966-25971)
 - (17) Released notice dated 08/17/99 (PHNA 26943-26946)
 - (18) E-mail from Wei Hong re: PHN131 Safety PAT Meeting Minutes 03/15/96 (PHNA 15450 and 15451)
201. Exhibits of Garry Bahling deposition taken in the Parker vs. Ford case, including but not limited to:
1. Paper by Mark Arndt and others entitled, *Evaluation of Experimental Restraints in Rollover Conditions*
 2. Set of seven articles
 3. List of Trial and Deposition Testimony for the last four years
 4. Billing stated dated 06/29/03 in the amount of \$6,238.95
 5. CD containing photographs
 6. CD containing photographs
 7. Correspondence file
 8. VHS tape of Malibu 2 tests
 9. VHS tape of Malibu 2 top drop tests
 10. CD containing photographs of vehicle inspection
 11. CD containing photographs of vehicle inspection
 12. CD containing photographs of vehicle inspection
 13. CD containing photographs of vehicle inspection
 14. CD containing photographs of vehicle inspection

202. Exhibits of Keith Friedman deposition taken in the Parker vs. Ford case on 08/29/03 including but not limited to.

1. Center for Injury Research Submission
2. Case Materials
3. Binder: Other Similar Incidents
4. Binder: OSI
5. Billing File
6. Headers from F150 and F250
7. Headers
8. Books of photos
9. Books of photos
10. Cross sections
11. Pictures: Tab 5
12. Volume: Rollover History Timelines
13. Volume: Rollover History Timelines
14. Volume: Rollover History Timelines
15. Case Binder
16. Index to Exhibit 18
17. Index: Box of CDs
18. Files
19. Correspondence Binder
20. Binder: Documents reviewed and relived upon
21. Binder: Documents reviewed and relived upon
22. Binder: Documents reviewed and relived upon
23. Documents
24. Index of discovery documents in binders and all documents identified therein

203. Exhibits of Edward A. Moffatt deposition taken in the Parker vs. Ford case on 09/11/03. including but not limited to:

1. Edward A. Moffatt Testimony Updated 08/18/03
2. "Head Excursion of Seat Belted Cadaver, Volunteers and Hybrid III ATD in a Dynamic/Static Rollover Fixture" by Edward A. Moffatt and others"
3. Handwritten Notes
4. Billing Records
5. Handwritten Notes entitled "Ward dep"
6. Handwritten Notes entitled "K. Friedman dep 8/29"
7. Handwritten Notes entitled "Sparkman - tow truck"
8. Handwritten Notes entitled "Tallant - FD/EMT"
9. Vehicle Inspection - Parker July 1, 2003
10. Medical Summary
11. Handwritten Notes and Correspondence File

204. Exhibits of Alfred J. Darold deposition taken in the Parker vs. Ford case on 09/10/03 including but not limited to:

1. Directive Product Safety Planning and Implementation
2. Staff Items Washington Affairs Office dated 05/31/95
3. Staff Items Washington Affairs Office Report 02/02/98
4. Staff Items Washington Affairs Office Report 04/27/98
5. Staff Items Washington Affairs Office Report 08/03/98
6. Staff Items Washington Affairs Office Report 01/19/99
7. Comments Regarding NHTSA 49 CFR Part 571
8. Safety Product Development XC-90
9. Test Report Number 258834
10. Crash-worthiness Criteria for the P-28

205. Exhibits of Thomas F. Patterson deposition taken in the Parker vs. Ford case on 09/09/03. including but not limited to:

1. Notes made by witness trying to reconstruct the efforts he underwent in searching for the finite element model for the PHN-131
2. Work Request sheet dated 11/21/02
3. Handwritten notes
4. 7 engineering concerns
5. Series of e-mails
6. Arun Trepathy document
7. E-mail from Srinivas Sanikommu
8. Affidavit of Thomas Patterson dated 07/08/03
9. Affidavit of Thomas Patterson dated 09/05/03
10. Letter dated 03/17/03 from Barry Toone to Greg Marks

206. Exhibits of Kenneth G. McCain deposition taken in the Parker vs. Ford case on 08/26/03. including but not limited to:

1. Notice of Intention to Take Oral Deposition of Kenneth G. McCain with Subpoena Duces Tecum
2. An Appraisal of the Earning Capacity of Mr. Patrick Parker dated 05/20/03
3. Resume of Kenneth Glenn McCain
4. List of Cases
5. Chart of Earning Capacity
6. Sink Life Care Plan by Elements
7. National Vital Statistics Report Dated 03/21/02
- 7a. Economic Report of the President Dated 02/03
- 7b. United States Department of Labor News Dated 12/11/02
- 7c. Worklife Estimates: Effects of Race and Education

- 7d. Return rate for six-month bill
 - 7e. National Vital Statistics Report dated 03/21/02
 8. Handwritten notes
 9. Sink & Associates Life Care Plan Summary of Costs
 10. File Folder
207. Exhibits of Jack Sink deposition taken in the Parker vs. Ford case on 09/02/03. including but not limited to:
1. Amended Notice of Intention to Take Oral Deposition of Jack M. Sink with Subpoena Duces Tecum
 2. Letter to Greg Marks from Janie R. Duceatt for Jack M. Sink dated 04/25/03 enclosing report
 3. Draft report
 4. Letter to Greg Marks for Dr. Jack Sink from Theresa Berk dated 09/02/03
 5. List of information in the file and information reviewed
 6. Winter 2002 Occupational Wages and Employment for Amarillo MSA, Texas
 7. Formula Created by the Model Spinal Cord Injury Centers
 8. Formula Created by the Model Spinal Cord Injury Centers
 9. Formula Created by the Model Spinal Cord Injury Centers
 10. Formula Created by the Model Spinal Cord Injury Centers
 11. Correspondence
 12. Medical records
 13. Miscellaneous Interview Forms and Case Notes
 14. Income Tax Records
 15. Texas Workers' Comp Records
 16. U.S. Census Bureau Disability Labor Force Status
 17. Literature on Omega Trac Wheelchair
 18. Referral Data Sheet
 19. Notice of Designation of Expert Witness and Expert Reports
 20. Invoice from Sink and Associates
 21. Health Cost Survey
 22. Resume of Jack M. Sink
 23. Deposition and Trial Testimony
 24. Miscellaneous Information on Equipment
 25. List of Reference Sources
 26. List of Defense Attorneys
 27. Resume of Judy Edwards-Bryun

208. Exhibits of William Muzzy's deposition taken in the Parker vs. Ford case on 09/15/03 including but not limited to:

1. Red Case Notebook
2. Miscellaneous Research
3. DV and Deposition and Trial List
4. Invoices
5. Correspondence
6. Volvo Test Report Number 258834

209. Exhibits of Scott Altman's deposition taken in the Parker vs. Ford case on 08/20/03 including but not limited to:

1. Project folder
2. Accident site diagram
3. Analysis diagram
4. Vehicle Dynamics
5. Photographs
6. Photographs
7. Vehicle Data
8. Accident Site diagram
9. Notes
10. Development of a Tumble Number for Use in Accident Reconstruction
11. Speed Analysis
12. Accident Reconstruction Analysis - Summary
13. Accident Reconstruction Analysis Vehicle Rollover Dynamics
14. Subject Vehicle Inspection
15. Photocopies of Photographs
16. Photographs
17. Roll Rate Analysis
18. Motor Vehicle Accident Reconstruction and Cause Analysis

210. Subject vehicle - 2001 Ford F250 pickup truck, vehicle identification number 1FTNX20L41EB99971.

211. Family Photographs (PP00815-PP00870).

212. Vehicle Photographs (PP00871-PP00885).

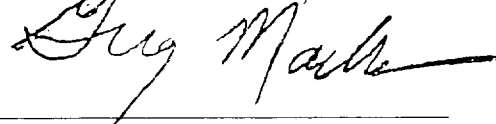
213. Injury Photographs (PP00886-PP00888).

214. W-2s of Patrick Parker (1999-2001) (PP00889-PP00891).

- 215. Baylor Institute for Rehabilitation medical and billing records (PP00381-PP00763; PP00768-814; PP00999-PP01006; PP01011-PP01093) and photos (PP00764-P00767).
- 216. Childress Family Clinic medical and billing records (PP00907-PP00923).
- 217. Childress Regional Medical Center medical and billing records (PP00936-PP00943; PP00969-PP00998).
- 218. EMPI medical and billing records (PP00892-PP00906) .
- 219. Family Clinic/Dr. Darter medical and billing records (PP00329-PP00345; PP00959-P00968).
- 220. Hardeman County Memorial Hospital Medical and Billing records (PP00015-19; PP00020-22); and affidavits for films (PP00023-24) and Deposition Upon Written Questions for Hardeman County Memorial Hospital .
- 221. Hardeman County EMS/Hardeman County Highway Patrol medical/billing records (PP00003-PP00008).
- 222. Dr. Ramanchadra Rao Makkena medical and billing records (PP00009-PP00013).
- 223. Dr. Leo Mercer medical and billing records (PP00327-PP00328).
- 224. Dr. Stephen Neece medical and billing records (PP00308-PP00324).
- 225. North Texas Anesthesia medical and billing records (PP00352-PP00355).
- 226. North Texas Neurology Associates medical and billing records (PP00356-PP00362).
- 227. Out-Patient Visiting Doctors Clinic/Dr. Mounir Zakhary medical and billing records (PP00924-PP00235).
- 228. Dr. Len Moore Ouzts medical and billings records (PP00325-PP00326).
- 229. Pathologists Bio-Medical Laboratories medical and billing records (PP00374-PP00375).
- 230. Project Walk Records (PP001094-PP001996) and Deposition Upon Written Questions.
- 231. Physiatriic Medicine Associates medical and billing records (PP00363-PP00373; PP00944-PP00968).
- 232. Radiology Associates medical and billing records (PP0000346-PP000347).

- 233. Texas Diagnostic Imaging medical and billing records (PP00348-PP00351).
- 234. Trans Star Ambulance medical and billing records (PP00376-PP00380).
- 235. United Regional Healthcare System medical and billing records (PP00027-PP00284 and PP00285-PP00307).
- 236. Medical/billing records by Deposition Upon Written Questions of Neil R. Veggeberg, M.D.
- 237. Medical/billing records by Deposition Upon Written Questions of George Wharton, M.D.
- 238. Dr. Mounir Zakhary medical and billing records (PP01007-PP01010).
- 239. Accident Report (PP00001-PP00002).

**THE LAW OFFICES OF
FRANK L. BRANSON, P.C.**

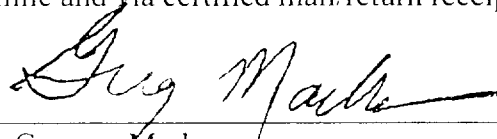


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**ATTORNEYS FOR PLAINTIFFS
PATRICK PARKER AND DENA PARKER**

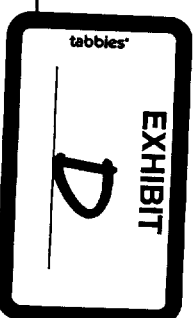
CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the above and foregoing instrument was served upon Rickey L. Faulkner, Esq., Brown McCarroll, L.L.P., Post Office Box 3999, Longview, Texas 75606-3999 and Patrick X. Fowler, Esq., Snell & Wilmer, L.L.P., One Arizona Center, 400 East Van Buren, Phoenix, Arizona 85004-2202, attorneys for Defendant Ford Motor Company on this the 19th day of September, 2003 via facsimile and via certified mail/return receipt requested.



J. Gregory Marks

FORD MOTOR COMPANY'S TRIAL EXHIBIT LIST



Exh. No.	Expect to use	May Use	Description
1		X	Feb 25, 1985 SAE 850535 paper by McCarthy, Lange et al entitled: An Examination of the Correlation Between Vehicle Performance in FMVSS 216 Versus Injury Rates in Rollover Accidents, (RC003163)
2	X		April 1984 840403 SAE paper by Strothers, Smith and Warner entitled Injury and Intrusion in Side Impacts and Rollovers, (RC005876)
3		X	10/01/93. Definition of Passenger Automobile from 49 C.F.R. Section 523.4. T00035001
4		X	10/01/93. Definition of Light Truck 49 C.F.R. Section 523.5. T00036001
5		X	00/00/00. Paper entitled "An Examination of Furrow Tripping and Vehicle Rollovers" by Brown, Stansifer and Guenther and accompanying videotape
6		X	00/00/85. Paper and photographs re "Rollover Crash Tests - The Influence of Roof Strength on Injury Mechanics," SAE 851734. (Malibu I). T00049001 - T00049023
7		X	00/00/85. Videotape - Malibu I, Scenes from GM Crash Tests Chevrolet Malibu's (1983-84).
8	X		00/00/90. Paper and photographs re "Rollover and Drop Tests - The Influence of Roof Strength on Injury Mechanics Using Belted Dummies," SAE 902314 (Malibu II). T00051001 - T00051012
9	X		00/00/90. Videotape - Malibu II, Scenes from Rollover Crash Tests and Drop Tests 1987 - 1989 Chevrolet Malibu Sedans GM Corporation.
10	X		FMVSS Standard No. 216; Roof Crush Resistance.
11		X	04/05/71. Intracompany memo from John Versace dated 4/5/71 re "Roof Crush Statistics for Docket 2-6; Notice 4", with attached report entitled "An Assessment of Roof Crush as a Contributor to Automotive Safety Problem, dated 4/5/71, by E. S. Grush. T00283001
12		X	12/28/77. "The Effectiveness of Belt Systems in Frontal and Rollover Crashes", by Donald F. Huelke SAE 770148.
13		X	Paper entitled "Reconstruction of Roll-over Collisions", by Orlovski, Moffatt, et al.
14		X	Paper entitled "Occupant Motion in rollover Collisions", by Edward Moffatt, American Association for Automotive Medicine, 1975.
15	X		1994. SAE Paper 840403 entitled "Injury and Intrusion in Side Impacts and Rollovers" by Strother, Smith, James, and Warner (1984). T00295001
16	X		Enlargement of Chart (Occupant Kinematics in Rollover Accidents) from SAE 902314 - "The Influence of Roof Strength on Injury Mechanics Using Belted Dummies"
17	X		Enlargement of Chart (Roof Crush and Injury in Rollover Accidents) from SAE 850335 - "An Examination of the Correlation Between Vehicle Performance in FMVSS 216 Versus Injury Rates in Rollover Accidents"

FORD MOTOR COMPANY'S TRIAL EXHIBIT LIST

18	X		Enlargement of <u>Chart</u> (Roof Crush and Injury in Rollover Accidents) from SAE 902314 - "Rollover and Drop Tests - The Influence of Roof Strength on Injury Mechanics Using Belted Dummies."
19		X	Enlargement of <u>Chart</u> (Occupant Restraints in Rollover Accidents) showing data from SAE 770148 - "The Effectiveness of Belt Systems in Frontal and Rollover Crashes"
20	X		"Injury Mechanisms in Rollover Collisions" by Hight, Siegal, and Nabam
21	X		FMVSS 208. T00311001
22	X		FMVSS 209. T00312001
23	X		FMVSS 210. T00313001
24	X		Jarrold Carter's Curriculum Vitae
25		X	Jarrold Carter's report dated 7/17/03
26		X	Jarrold Carter's report dated 9/8/03
27	X		(95) Vehicle inspection photographs taken by J. Carter 6/25/03
28	X		Vehicle inspection photographs taken by J. Carter 9/10/03
29	X		(96) Site inspection photographs taken by J. Carter 6/26/03
30	X		Photographs of Exemplar F-250
31		X	Accident scene diagram containing topographical information from scene survey conducted by Abrahamson and Associates on 9/4/03
32		X	Accident scene diagram with scene evidence plotted based on scene survey of Scott Altman
33	X		Overlay of topographical survey from Abrahamson and Associates and scene evidence survey by Scott Altman
34	X		Accident sequence diagram prepared by J. Carter
35		X	Calculations prepared by J. Carter
36	X		Scale model of accident scene with scene evidence laid out
37	X		Scale model of F-250
38	X		Images and measurements from 2D photogrammetric reconstruction of roof and driver's door damage
39	X		Photographs of time-in-motion study conducted by J. Carter using scale models of the accident scene and vehicle
40		X	Images and animation of 3D computer model of accident vehicle and exemplar vehicle
41	X		Photographs taken by J. Carter of Rollover Demonstration of a 2001 F-250 performed 9/12/03
42		X	J. Carter's handwritten notes of Rollover Demonstration of a 2001 F-250 performed 9/12/03
43	X		Data, notes, and photographs of Rollover Demonstration of a 2001 F-250 performed 9/12/03
44		X	Videotape of Rollover Demonstration of a 2001 F-250 performed 9/12/03
45		X	SAE paper 980022 - Characteristics of Soil-Tripped Rollovers by Cooperrider, Hammoud and Colwel
46	X		Ed Moffatt's Curriculum Vitae

FORD MOTOR COMPANY'S TRIAL EXHIBIT LIST

47		X	Ed Moffatt's expert report dated 7/17/03
48		X	SAE paper 973347 - Head Excursion of Seat Belted Cadaver, Volunteers and Hybrid II ATD in Dynamic/Static Fixture by Moffatt et al
49		X	SAE paper 952712 - Evaluation of Experimental Restraints in Rollover Conditions by Arndt et al
50	X		SAE paper 2003-01-0172 - Matched-Pair Rollover Impacts of Roll caged and Production Roof Cars Using the Controlled Rollover Impact System (CRIS) by Moffatt et al
51	X		Paper - The Relationship Between Vehicle Roof Strength and Occupant Injury in Rollover Crash Data, Moffatt, et al, Association for the Advancement of Automotive Medicine, 1995
52	X		Paper - Rollovers of Passenger Cars in France, 12th International Technical Conference on Experimental Safety Vehicles, NHTSA 1989
53		X	Paper - ESV Rollover Test methods, Report on the Second International Technical Conference on Experimental Safety Vehicles, NHTSA, 1971
54		X	Paper - The Urban Rollover: Characteristics, Injuries, Seat-Belts and Ejection, 13th International Technical Conference on Experimental Safety Vehicles, 1991
55		X	Discussion of SAE 820244, Crash Protection, SAE SP-513, by J. Provesal 1982
56	X		Paper - Occupant Protection During Vehicle Rollover, K. Stone, 5th International Technical Conference on Experimental Safety Vehicles, June 1974
57		X	Paper - An Analysis of Body Loads During Rollover Tests; Roof Crush and Occupant Protection, K. Friedewald, Paper number 96-S5-O-09, 1996
58		X	970396 SAE Paper - Injury Mechanisms and Field Accident Data Analysis in Rollover Crashes, M. James, D. Allsop, R. Nordhagen and R. Decker, 1997
59		X	Paper - In-Depth Study of Volvo Cars in Rollover Crashes, A. Lund, C. Palmertz, L. Jakobsson, G. Andersson and I. Esaksson-Hellman, IRCOBI Conference - Stiges, September 1999
60		X	980362 SAE Paper - Injury Causation in Rollover Crashes and the Biofidelity of Hybrid III Data in Rollover Tests, R. Piziali, R. Hopper, D. Girvan and R. Merala, International Congress and Exposition, February 23-26, 1998
61	X		CD containing CVRP PowerPoint Presentation 2003 SAE Congress 3/3/03
62	X		Poster board illustrating diving injury mechanism
63	X		Poster board demonstrating torso augmentation causing neck injury
64	X		Exhibit with hinged roof demonstrating mechanics of roof deformation
65		X	Miniature video camera and monitor
66	X		Gary Bahling's Curriculum Vitae
67		X	Gary Bahling's expert report dated 7/21/03

FORD MOTOR COMPANY'S TRIAL EXHIBIT LIST

68	X		(125) Vehicle inspection photographs taken by G. Bahling 6/18/03
69		X	Side rail cut-out from Chevy 3/4 Ton pickup
70		X	Side rail cut-out from Dodge 3/4 Ton pickup
71		X	Side rail cut-out from Ford 3/4 Ton pickup
72		X	A Pillar cut-out from Chevy 3/4 Ton pickup
73		X	A Pillar cut-out from Dodge 3/4 Ton pickup
74		X	A Pillar cut-out from Ford 3/4 Ton pickup
75		X	Header cut-out from Chevy 3/4 Ton pickup
76		X	Header cut-out from Dodge 3/4 Ton pickup
77		X	Header cut-out from Ford 3/4 Ton pickup
78		X	cut-out of the corner of the top corner where A pillar meets roof rail Chevy 3/4 Ton pickup
79		X	cut-out of the corner of the top corner where A pillar meets roof rail Dodge 3/4 Ton pickup
80		X	cut-out of the corner of the top corner where A pillar meets roof rail Ford 3/4 Ton pickup
81		X	Graphs of NASS data depicting distribution of injury in rollover accidents
82		X	Summary of applicable FMVSS test results on subject vehicle and comparative vehicles
83		X	Report and Videos: "The Influence of Increased Roof Strength on Belted and Unbelted Dummies in rollover and Drop Tests" the Journal of Trauma, April 1995
84		X	Report: "Quasi Static and Dynamic Roof Crush Testing" NHTSA VRTC-82-0197/VRTC-86-0391
85	X		Full scale cross section of F-250
86	X		Full size 2001 F-250 body buck
87		X	FMVSS 216 test results for F-250 and competitive vehicles
88		X	Analysis of Malibu 7L4 hit
89		X	Test Report Video 1991 Volvo 740 dolly rollover
90		X	Roof rail Delta V calculations from rollover testing
91		X	Report: "Near and Far-Side Adult Front Passenger Kinematics in Vehicle Rollover"
92		X	F-16 Restraint Harness
93		X	Report: "Evaluation of Experimental Restraints in Rollover Conditions"
94		X	Reports and video: "50 mph Blazer Rollover with and without Roll cage"
95	X		Michelle Vogler's Curriculum Vitae
96		X	Michelle Vogler's expert report dated 7/18/03
97		X	Accident Frequency 2001 (<i>pie chart</i>)
98		X	Accident Risks for Vehicle Categories (<i>bar charts</i>)

FORD MOTOR COMPANY'S TRIAL EXHIBIT LIST

99		X	Ford F-250 Super Duty – Super Cab 1999-2000 (per vehicle registered for one year)
100		X	Accident Risks by Vehicle(<i>scatter chart</i>)
101	X		Rollover Accident Risks by Vehicle(<i>scatter chart</i>)
102		X	Fatal/Severe Accident Risks by Vehicle(<i>scatter chart</i>)
103		X	Fatal/Severe Rollover Accident Risks by Vehicle(<i>scatter chart</i>)
104	X		Belted Fatal/Severe Accident Risks by Vehicle(<i>scatter chart</i>)
105	X		Belted Fatal/Severe Rollover Accident Risks by Vehicle(<i>scatter chart</i>)
106		X	Fatal Rollover Frequency 2001 <i>pie chart</i>)
107		X	Fatal Accident Risks by Vehicle(<i>scatter chart</i>)
108		X	Fatal Rollover Accident Risks by Vehicle(<i>scatter chart</i>)
109		X	Belted Occupant Injury Risks for Vehicle Categories (Percent of Occupants with Fatal/Severe Injuries)
110		X	Unbelted Occupant Injury Risks for Vehicle Categories (Percent of Occupants with Fatal/Severe Injuries)
111	X		Belted Occupant Injury Risk in Rollovers by Vehicle (Percent of Occupants with Fatal/Severe Injuries)
112		X	Unbelted Occupant Injury Risk in Rollovers by Vehicle (Percent of Occupants with Fatal/Severe Injuries)
113	X		Belted Occupant Fatality Risk in Rollovers by Vehicle (Percent of Occupants with Fatal Injuries)
114		X	Unbelted Occupant Fatality Risk in Rollovers by Vehicle (Percent of Occupants with Fatal Injuries)
115		X	Comparison of Fatal/Severe Injuries in All Rollover Accidents(<i>pie charts</i>)
116		X	Comparison of Fatal/Severe Injuries of Non-ejected Occupants(<i>pie charts</i>)
117		X	Influence of Belt Use on Fatalities in Rollover Accidents (<i>pie chart</i>)
118	X		Roll Count Distribution in Single Vehicle Rollover Accidents(<i>bar chart</i>)
119	X		Risk of Fatal or Severe Injury in a Single Vehicle Rollover Accident(<i>line graph</i>)
120	X		Risk of Front Outboard Occupant Injury in Rollovers(<i>bar chart</i>)
121		X	Percentage of Rollover Accidents Associated with Accident Specific Factors(<i>bar chart</i>)
122		X	Percent of Fatal Single Vehicle Accident Vehicles that Rollover when Driver Factor is Noted(<i>bar chart</i>)
123		X	Percent of Fatal Single Vehicle Accident Vehicles that Rollover when Vehicle Factor is Noted(<i>bar chart</i>)
124		X	Vehicles with Different Single Vehicle Accident Rollover Rates and Similar T/2H Value(<i>bar charts</i>)
125		X	Vehicles with Different Fatal Single Vehicle Accident Rollover Rates and Similar T/2H Value(<i>bar charts</i>)
126		X	Vehicles with Different T/2H Values and Similar Single Vehicle Accident Rollover Rate(<i>bar charts</i>)
127		X	Vehicles with Different T/2H Values and Similar Fatal Single Vehicle Accident Rollover Rate(<i>bar charts</i>)
128		X	Variation in Single Vehicle Rollover Rates with Different Body Styles of the Same Model (<i>bar charts</i>)
129		X	Variation in Fatal Single Vehicle Rollover Rates with Different Body Styles of the Same Model (<i>bar charts</i>)
130		X	SVA Rollovers per SVA Accident By NHTSA's 5-Star Rating

FORD MOTOR COMPANY'S TRIAL EXHIBIT LIST

131		X	SVA Rollovers per RVY By NHTSA's 5-Star Rating
132		X	All Rollovers per RVY By NHTSA's 5-Star Rating
133		X	Fatal SVA Rollovers per RVY By NHTSA's 5-Star Rating
134		X	Fatal Rollovers per RVY By NHTSA's 5-Star Rating
135	X		Data, notes and Photographs of Horizontal Platen Roof Crush test of a 2001 Ford F-250 SuperCab Pickup performed 8/19/03
136		X	Videotape of Horizontal Platen Roof Crush test of a 2001 Ford F-250 SuperCab Pickup performed 8/19/03
137	X		Data, notes and photographs of Horizontal Platen Roof Crush test of a 2001 Dodge Ram 2500 Quad Cab Pickup performed 8/19/03
138		X	Videotape of Horizontal Platen Roof Crush test of a 2001 Dodge Ram 2500 Quad Cab Pickup performed 8/19/03
139	X		Data, notes and photographs of Horizontal Platen Roof Crush test of a 2001 Chevrolet Silverado 2500 Extended Cab Pickup performed 8/20/03
140		X	Videotape of Horizontal Platen Roof Crush test of a 2001 Chevrolet Silverado 2500 Extended Cab Pickup performed 8/20/03
141	X		Data, notes and photographs of a Driver side A-Pillar 216 test on a 2001 Ford F-250 SuperCab Pickup performed 7/1/03
142		X	Videotape of a Driver side A-Pillar 216 test on a 2001 Ford F-250 SuperCab Pickup performed 7/1/03
143	X		Data and video from CRIS test 50302
144	X		Data and video from CRIS test 50902
145	X		Data and video from CRIS test 51502
146	X		Data and video from CRIS test 61102
147	X		Data and video from CRIS test 61802
148	X		Data and video from CRIS test 62102
149		X	Data and video from production Crown Victoria FMVSS 216 test
150		X	Data and video from reinforced roof Crown Victoria FMVSS216 test
151		X	videotape of DIADDEM timing analysis of selected tests and comparisons
152	X		Blow-up of 6 vehicles used in CRIS testing
153	X		Records received pursuant to custodian of records subpoena for Trooper Russell Conkling re Texas Accident report dated 8/29/01
154		X	Owner's Manual for the 2001 F-250 Super Duty vehicle,
155		X	Vehicle invoice for the subject 2001 F-250 Super Duty truck
156		X	Safety Certification label for subject 2001 F-250

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157	X	5/7/92 Ford letter re Corporate Safety Segment Design Guidelines for Resistance to Rollover
158	X	6/14/93 Ford Letter re Corporate Safety Segment Design Guidelines for Resistance to Rollover
159	X	Ford 1974-1976 Master Plan Rollover and Side Impact Ford Document, dated 1971
160	X	Roof Crush Variability Study using FEA and DOE, dated 12/23/94
161	X	National Highway Safety Bureau document entitled "Roof Intrusion Protection for Passenger Cars," dated 1/6/71
162	X	Program Description Books applicable to any PN96 Vehicle
163	X	Ford's FMVSS 208 Certification package
164	X	Ford's FMVSS 209 Certification package
165	X	Ford's FMVSS 210 Certification package
166	X	1998 PHN131 Total Program Work Plan
167	X	Analytical Sign-Off for PHN-131 CP Design April 1996
168	X	2/1/84 internal Ford memo from D. Petersen, Directive: Product Safety Planning and Implementation
169	X	NAAO Passenger Car & Light Truck Safety Design Guidelines 5/10/94
170	X	1999 PN 131 Program Durability Test Status
171	X	Engineering Subsystem Sign-Off Summary, 5/16/97 - Exterior Systems
172	X	Engineering Subsystem Sign-off Summary - Seats/ Restraints, 5/16/97
173	X	Body Sign-off status
174	X	1999 P-131 F-series signoff status vehicle dynamics development, steering, ride, handling, and tires summary
175	X	P-131 Craftsmanship Summary
176	X	1999 P131 Engineering Subsystem Sign-off Summary, Seats & Restraints
177	X	PHN131 Sign-off Plan
178	X	PHN131 Prototype Readiness Reliability Review Presentation 1/26/96
179	X	Test Procedure P3-103
180	X	Test Procedure P3-107
181	X	Test Procedure P3-108
182	X	Test Procedure P3-116
183	X	DVD of Volvo XC90 dolly rollover testing, test 1
184	X	DVD of Volvo XC90 dolly rollover testing, test 2
185	X	DVD of Volvo XC90 dolly rollover testing, test 3
186	X	Videotape: Ranger Durability 6:30
187	X	W2 Wage and Tax Statements 1999-2001 of Plaintiff Patrick C. Parker
188	X	Verfact's notes from telephone interview of David @ Akers Body Shop dated 10/14/02

FORD MOTOR COMPANY'S TRIAL EXHIBIT LIST

189	X	Verifact's notes from telephone interview of secretary @ Akers Body Shop dated 10/16/02
190	X	Verifact's notes from Interview of Trooper Conkling dated 10/10/02
191	X	William Muzzy's list of prior testimony
192	X	William Muzzy's billing file
193	X	Carly Ward's list of prior testimony
194	X	Carly Ward's billing file
195	X	Keith Friedman's list of prior testimony
196	X	Keith Friedman's billing file
197	X	Scott Altman's list of prior testimony
198	X	Scott Altman's billing file
199	X	(15) Subject Vehicle Photographs produced by plaintiff
200	X	(24) Accident Site Photos taken by Investigator James Wolsch on 10/10/02
201	X	Laser copies of Scott Altman's Site Photographs taken 4/1/02
202	X	Laser copies of Scott Altman's vehicle inspection photographs taken 4/16/02
203	X	Laser copies of Scott Altman's vehicle Dynamics model photographs taken 7/30/03
204	X	Laser copies of William Muzzy's vehicle inspection photographs taken 9/16/02
205	X	Laser copies of Carly Ward's exemplar testing inspection taken 5/9/03
206	X	Photographs of T. Patterson's vehicle inspection
207	X	12/6/01 letter from R. Strassburger of Alliance of Automobile Manufacturers to NHTSA re FMVSS 216, request for comments, Docket 1999-5572
208	X	12/3/2001 letter from M. Reynolds of DaimlerChrysler to NHTSA re FMVSS 216, request for comments, Docket 1999-5572
209	X	12/4/01 Letter from Ford to NHTSA re FMVSS 216, request for comments, Docket 1999-5572
210	X	12/5/01 Letter from J. Gutting of GM to NHTSA re FMVSS 216, request for comments, Docket 1999-5572
211	X	12/6/01 letter from N. Fuji on Nissan to NHTSA re FMVSS 216, request for comments, Docket 1999-5572
212	X	NHTSA Laboratory Test Procedure for FMVSS 216, TP-216-04 8/1/89
213	X	NHTSA Office of Vehicle Safety Compliance - Compliance Testing Program
214	X	SAE 2000-01-1651 "Development of an Automotive Rollover Sensor" by Wallner and Schiffmann
215	X	7/14/94 letter from M. Asensio of SAE to D. Friedman re paper no. 12SC44
216	X	Autoliv Test Report, test no. B180196
217	X	Videotape of Autoliv Test Report, test no. B180196
218	X	Autoliv Test Report, test no. B180220

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219	X	Videotape of Autoliv Test Report, test no. B180220
220	X	Autoliv Test Report, test no. B190043
221	X	Videotape of Autoliv Test Report, test no. B190043
222	X	Autoliv Test Report, test no. B190044
223	X	Videotape of Autoliv Test Report, test no. B190044
224	X	Autoliv Test Report, test nos. B190046 & B190047
225	X	Videotape of Autoliv Test Report, test nos. B190046 & B190047
226	X	Autoliv Test Report, test no. B190049
227	X	Videotape of Autoliv Test Report, test no. B190049
228	X	Autoliv Test Report, test no. B190050
229	X	Videotape of Autoliv Test Report, test no. B190050
230	X	Autoliv Test Report, test no. B190065
231	X	Videotape of Autoliv Test Report, test no. B190065
232	X	Autoliv Test Report, test no. B190066
233	X	Autoliv Test Report, test no. B190073
234	X	Videotape of Autoliv Test Report, test no. B190073
235	X	Autoliv Test Report, test no. B190074
236	X	Videotape of Autoliv Test Report, test no. B190074
237	X	Autoliv Test Report, test nos. B190075-81
238	X	Videotapes of Autoliv Test Report, test nos. B190075-81
239	X	Autoliv Test Report, test nos. B190095-104
240	X	Videotape of Autoliv Test Report, test nos. B190095-97
241	X	Autoliv Test Report, test nos. B180189 & B180191
242	X	Videotape of Autoliv Test Report, test nos. B180189 & B180191
243	X	Autoliv Test Report, test no. B180190
244	X	Autoliv Test Report, test nos. B180207, B180209 & B180210
245	X	Videotape of Autoliv Test Report, test nos. B180207, B180209 & B180210
246	X	Autoliv Test Report, test no. B180219
247	X	Autoliv Test Report, test nos. B180223, B180224 & B180225
248	X	Videotape of Autoliv Test Report, test nos. B180223, B180224 & B180225
249	X	Autoliv Test Report, test no. B190015
250	X	Videotape of Autoliv Test Report, test no. B190015

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251		X	Autoliv Test Report, test nos. B190019 & B190020
252		X	Videotape of Autoliv Test Report, test nos. B190019 & B190020
253	X		National Traffic and Motor Vehicle Safety Act of 1966, Public Law 89-563
254		X	SAE paper 2002-01-0694 entitled "A Comparison of the Controlled Rollover Impact System (CRIS) with the J2114 Rollover Dolly" authored by Carter, Habberstad, and Croteau
255		X	Jarrold Carter's Report dated September 19, 2003
256		X	Records - Altus Surgery & Urology Associates
257		X	Records - Baylor Institute of Rehabilitation
258		X	Records - Blue Cross/Blue Shield of Texas
259		X	Records - Dr. Ramachandra Rao Makkena
260		X	Records - Childress Family Clinic
261		X	Records - Childress Regional Medical Center
262		X	Records - Out-Patient Visiting Doctors Clinic
263		X	Records - EMPI
264		X	Records - Hardeman County Memorial Hospital
265		X	Records - Hardeman County Memorial Hospital - Radiology
266		X	Records - Hardeman County EMS
267		X	Records - Hardeman County Sheriff's Office
268		X	Records - Neurological Surgery of Wichita Falls and Dr. Stephen Neece, M.D.
269		X	Records - Project Walk
270		X	Records - TXU
271		X	Records - Texas Department of Public Safety
272		X	Records - Trans Star Ambulance
273		X	Records - United Regional Health Care System
274		X	Records - United Regional Health Care System - Radiology
275		X	Records - Dr. Neil R. Vegeberg and High Plains Rehab Association
276		X	Records - Dr. George Wharton and HealthSouth Medical Center
277	X		Dr. James Vinson's Report dated June 30, 2003
278	X		Dr. James Vinson's Report dated July 16, 2003
279	X		Dr. James Vinson's Future Cost of Care Table
280	X		CPI Detailed Report - Data for March 2003
281	X		Table 29 - Historical Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W)

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282	X		CPI Detailed Report – Data for February 2003
283	X		Pages 296 and 297 from book titled Spinal Cord Injury
284	X		Page 77 from document entitled Spinal Cord Medicine – Table 4.3 Life Expectancy of Patients with Spinal Cord Injury Treated at Model Systems Who Survive at Least 1 Year Post Injury.
285	X		Future Cost Care for Mr. Patrick Parker 2003-2026.
286		X	Various tables from Economic Report of the President – February 2002
287	X		Table 14-2 Life Expectancy for Person with Spinal Cord Injuries Who Survive at Least 24 Hours Post Injury by Age at Injury and Neurologic Category from Spinal Cord Injury – Clinical Outcomes from the Model Systems
288	X		Dr. E. L. Workman's Report dated July 3, 2003
289	X		Dr. E. L. Workman's Care Cost Projections
290	X		Detailed Wages – Compare Wages (Wages: Home Health Aides)
291	X		Job Search: Job Details
292	X		Detailed Wages – Compare Wages (Wages: Farmworkers, Farm and Ranch Animals – U.S., Texas, Lubbock)
293	X		Detailed Wages – Compare Wages (Wages: Farmworkers, Farm & Ranch Animals – U.S., Texas, Amarillo)
294	X		Detailed Wages – Compare Wages (Wages: Farmworkers and Laborers, Crop, Nursery and Greenhouse – U.S., Texas, Lubbock)
295	X		Information re: Childress
296		X	Map of Western Texas
297	X		Employment Status of Rehabilitated Clients Before and After Rehabilitation
298	X		Figure 5.1 – Comparative Outcomes of Rehabilitation Programs
299		X	Dr. McCoin's Oral Deposition taken on August 26, 2003
300	X		Dr. McCoin's Report dated May 20, 2003 (Deposition Exh. 2)
301		X	Dr. McCoin's Supplemental Report dated September 19, 2003
302		X	Chart of Earning Capacity Calculations Year by Year (Deposition Exh. 5)
303		X	Dr. Sink's Life Care Plan by Elements (Deposition Exh. 6)
304		X	National Vital Statistics Report Dated 3/21/02 - Table 5 (Deposition Exh. 7)
305		X	Economic Report of the President dated 2/03 – Tables (Deposition Exh. 7a)
306		X	United States Department of Labor News Dates 12/11/02 – Table 9 (Deposition Exh. 7b)
307		X	Worklife Estimates : Effects of Race and Education – Table A-3 (Deposition Exh. 7c)
308		X	National Vital Statistics Reports dated 3/21/02 – Table 5 (Deposition Exh. 7e)
309		X	Dr. McCoin's Handwritten Notes (Deposition Exh. 8)
310		X	McCoin's Expert File (Deposition Exh. 10)

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311		X	Dr. Sink's Oral Deposition taken September 2, 2003
312	X		Dr. Sink's Report dated 4/25/03
313		X	Home Care – Option 2 dated 9/2/03 (Deposition Exh. 4)
314		X	Dr. Sink's Addendum to Narrative
315		X	Dr. Sink's Expert File (Deposition Exh. 5)
316		X	Winter 2002 Occupational Wages and Employment for Amarillo, MSA (Deposition Exh. 6)
317		X	Formula Created by the Model Spinal Cord Injury Centers (Deposition Exh. 7)
318		X	Formula Created by the Model Spinal Cord Injury Centers (Deposition Exh. 8)
319		X	Formula Created by the Model Spinal Cord Injury Centers (Deposition Exh. 9)
320		X	Formula Created by the Model Spinal Cord Injury Centers (Deposition Exh. 10)
321		X	Correspondence between Sink and Dr. Darter (Deposition Exh. 11)
322		X	Misc. Interview Ford and Case Notes (Deposition Exh. 13)
323		X	U.S. Census Bureau Disability Labor Force Status - Work Disability Status of Civilians 16 to 74 Years Old by Education, Attainment and Sex 2002. (Deposition Exh. 16)
324		X	Referral data Sheet (Deposition Exh. 18)
325		X	Invoice from Sink (Deposition Exh. 20)
326		X	Health Cost Survey (Deposition Exh. 21)
327		X	CV of Judy Edwards Bruyn